

TSD File Inventory Index

Date: September 10, 2007

Initial: CM/Kerens

Facility Name: <u>CNW, Inc. / CNW Acquisitions, LLC</u>			
Facility Identification Number: <u>OH-982601294</u>			
A.1 General Correspondence		B.2 Permit Docket (B.1.2)	
A.2 Part A / Interim Status		.1 Correspondence	
.1 Correspondence		.2 All Other Permitting Documents (Not Part of the ARA)	
.2 Notification and Acknowledgment		C.1 Compliance - (Inspection Reports)	
.3 Part A Application and Amendments		C.2 Compliance/Enforcement <u>C.2</u>	<u>1</u>
.4 Financial Insurance (Sudden, Non Sudden)		.1 Land Disposal Restriction Notifications	
.5 Change Under Interim Status Requests		.2 Import/Export Notifications	
.6 Annual and Biennial Reports		C.3 FOIA Exemptions - Non-Releasable Documents	
A.3 Groundwater Monitoring		D.1 Corrective Action/Facility Assessment	
.1 Correspondence		.1 RFA Correspondence	
.2 Reports		.2 Background Reports, Supporting Docs and Studies	
A.4 Closure/Post Closure		.3 State Prelim. Investigation Memos	
.1 Correspondence		.4 RFA Reports	
.2 Closure/Post Closure Plans, Certificates, etc		D. 2 Corrective Action/Facility Investigation	
A.5 Ambient Air Monitoring		.1 RFI Correspondence	
.1 Correspondence		.2 RFI Workplan	
.2 Reports		.3 RFI Program Reports and Oversight	
B.1 Administrative Record		.4 RFI Draft /Final Report	
		5. RFI QAPP	

Total - 1

.6 RFI QAPP Correspondence		.8 Progress Reports	
.7 Lab Data, Soil-Sampling/Groundwater		D.5 Corrective Action/Enforcement	
.8 RFI Progress Reports		.1 Administrative Record 3008(h) Order	
.9 Interim Measures Correspondence		.2 Other Non-AR Documents	
.10 Interim Measures Workplan and Reports		D.6 Environmental Indicator Determinations	
D.3 Corrective Action/Remediation Study		.1 Forms/Checklists	
.1 CMS Correspondence		E. Boilers and Industrial Furnaces (BIF)	
.2 Interim Measures		.1 Correspondence	
.3 CMS Workplan		.2 Reports	
.4 CMS Draft/Final Report		F Imagery/Special Studies (Videos, photos, disks, maps, blueprints, drawings, and other special materials.)	
.5 Stabilization		G.1 Risk Assessment	
.6 CMS Progress Reports		.1 Human/Ecological Assessment	
.7 Lab Data, Soil-Sampling/Groundwater		.2 Compliance and Enforcement	
D.4 Corrective Action Remediation Implementation		.3 Enforcement Confidential	
.1 CMI Correspondence		.4 Ecological - Administrative Record	
.2 CMI Workplan		.5 Permitting	
.3 CMI Program Reports and Oversight		.6 Corrective Action Remediation Study	
.4 CMI Draft/Final Reports		.7 Corrective Action/Remediation Implementation	
.5 CMI QAPP		.8 Endangered Species Act	
.6 CMI QAPP Correspondence		.9 Environmental Justice	
1			

Note: Transmittal Letter to Be Included with Reports.
Comments: _____

TSD File Inventory Index

Date: September 10, 2007

Initial: CM/Kerred

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Facility Identification Number: <u>OH 982 601 294</u>			
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1			

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Comments: _____



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

AUG 13 2004

REPLY TO THE ATTENTION OF:

Certified Mail
Return Receipt Requested

R-19J

Mr. Brian M. Babb, Esq.
Keating, Muething & Klekamp, P.L.L.
1400 Provident Tower
One East Fourth Street
Cincinnati, Ohio 45202

Re: *Notice of Violation and Final Determination*
October 6, 2003 Voluntary Disclosure of Noncompliance by CNW, Inc. and CNW
Acquisition, LLC *QND 982 601 296*

Dear Mr. Babb:

On July 14, 2003, CNW, Inc. and CNW Acquisition, LLC (collectively "CNW"), disclosed to the United States Environmental Protection Agency (U.S. EPA), Region 5, Chicago, that it committed violations of the Clean Air Act, the Clean Water Act, the Resource Conservation and Recovery Act, and the Emergency Planning and Community Right-To-Know Act, at the CNW manufacturing facility located at 4710 Madison Road, Cincinnati, Ohio. CNW disclosed these violations with the intent to receive penalty reductions provided under our Small Business Compliance Policy, 65 Fed. Reg. 19630 (April 11, 2000). CNW submitted additional information to us in correspondence dated December 8, 2003 and February 25, 2004. We have reviewed this information, and this letter constitutes our Final Determination that a Notice of Violation is warranted regarding these disclosures, and that we will not seek monetary penalties from CNW for the disclosed violations.

Notice of Violation

U.S. EPA has determined, based on information CNW has submitted to us in the above-referenced letters, that CNW committed the following violations at its Cincinnati, Ohio facility:

Clean Water Act (CWA) violations:

CNW violated the CWA by failing to obtain a National Pollutant Discharge Elimination System permit for storm water discharges associated with industrial activity and to implement a storm water pollution prevention plan as required by Section 402 of the CWA, 33 U.S.C. § 1342 and 40 C.F.R. pt.122.

Clean Air Act (CAA) violations:

CNW violated the CAA by failing to obtain permits to install and permits to operate for several air contaminant sources as required by Sections 3745-31 and 3745-35 of the Ohio Administrative Code (OAC), rules that are part of the State Implementation Plan (SIP) and approved by U.S. EPA at 68 FR 2909 and 47 FR 25145, respectively. Section 113 of the CAA, 42 U.S.C. § 7413 allows federal enforcement of the SIP.

Resource Conservation and Recovery Act (RCRA) violations:

CNW violated the RCRA by failing to comply with generator hazardous waste standards required by Section 3002, 42 U.S.C. § 6922 and promulgated at 40 C.F.R. § 262 and Section 3745-52 of the OAC. Section 3745-52 includes rules that are part of the State hazardous waste program authorized under Section 3006 of the RCRA, 42 U.S.C. § 6926. Section 3008 of the RCRA, 42 U.S.C. § 6928, allows federal enforcement of the State hazardous waste program.

Emergency Planning and Community Right to Know Act (EPCRA) violations:

CNW violated the EPCRA because it did not file timely the Toxic Release Inventory (TRI) forms for copper compounds for reporting years 1998, 1999, 2000, 2001, and 2002. CNW also failed to file timely TRI forms for chromium for reporting year 1998. Under Section 313 of EPCRA, 42 U.S.C. § 11023, TRI forms must be filed with the State of Ohio and U.S. EPA by July 1 of the year following the reporting year for any toxic chemical manufactured, processed, or otherwise used in quantities above the reporting threshold.

Final Determination

We have determined that CNW has met the conditions under the Small Business Compliance Policy for a 100% reduction in the gravity-based penalty. We have also determined that we will not attempt to collect the amount of any economic benefit that CNW may have incurred by the above referenced violations. In consideration of these determinations, we will not seek any penalties for the violations CNW disclosed in its above-referenced letters to U.S. EPA.

However, please note the following. This Notice of Violation and Final Determination (NOVFD) resolves only the potential claims for civil penalties. Nothing in this NOVFD is intended to be, nor shall be, construed to operate in any way to resolve the criminal liability, if any, of CNW. We reserve the right to require compliance, corrective action, and other remedial measures in connection with any violations, including those alleged in this NOVFD.

This NOVFD shall not relieve CNW of its obligation to comply with all applicable provisions of federal, state and local law, nor shall it be construed to be a ruling on, or determination of, any issue relating to any federal, state or local permit. Also, this NOVFD does not constitute a waiver, suspension or modification of the requirements of environmental statutes or any regulations promulgated thereunder. We reserve the right to undertake action against any person, including CNW, in response to any condition which we determine may present an imminent and substantial endangerment to public health or the environment.

We reserve the right to revoke this NOVFD and, thereby, render such NOVFD null and void, if and to the extent that any information or certification provided by CNW, upon which we based the mitigation of the civil penalty, is later determined to be materially false, inaccurate, or incomplete. In such event, we reserve the right to assess and collect all civil penalties for any violation described in this NOVFD. Such revocation shall be in writing and shall become effective upon receipt by CNW.

In issuing this NOVFD, we seek to promote self-auditing by CNW, and expect CNW to be in full compliance with regulatory requirements and to continue to implement the internal procedures necessary to prevent recurrences of violations of environmental requirements. We appreciate CNW's willingness to self-audit, disclose and correct violations in a timely manner. Should you have any questions, please contact Erik Olson, Assistant Regional Counsel, at (312) 886-6829.

Sincerely,



Bharat Mathur
Acting Regional Administrator

cc: Erik Olson, C-14J
Erik Hardin, AE-17J
Bryan Gangwisch, DE-9J
Maynard Shaw, DT-8J
Duane Heaton, WC-15J



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

February 25, 2004

MEMORANDUM

SUBJECT: CNW Self Disclosure, Response to EPA Request for Info

FROM: Erik Olson *EO*
Office of Regional Counsel

TO: Erik Hardin, AE-17J
Brian Gangwisch, DE-9J
Maynard Shaw, DT-8J
Duane Heaton, WC-15J

CNW has responded to our February 11, 2004 request for additional information regarding their self disclosure. Enclosed are the documents that address the correction of disclosed violations enforced by your program.

Please review the documents and let me know if you have any question as to whether the violations have been corrected. Remember that we are evaluating this disclosure under the Small Business Policy rather than the more strenuous criteria of the Self-Disclosure Policy, so we need not evaluate whether the disclosure is the result of an "environmental audit" or "compliance management system." If I haven't heard from you by the week of March 8, I will contact you to discuss whether we need additional information from CNW and whether or not the violations resulted in any economic benefit.

Thank you all for your work in evaluating this disclosure.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF

VIA FACSIMILE AND
FIRST CLASS MAIL

C-14J

February 11, 2004

Mr. Brian M. Babb, Esq.
Keating, Muething & Klekamp, P.L.L.
1400 Provident Tower
One East Fourth Street
Cincinnati, Ohio 45202

Re: *October 6, 2003 Voluntary Disclosure of Noncompliance by CNW, Inc. and CNW Acquisition, LLC*

Dear Mr. Babb:

Thank you for your December 8 response to our request for additional information regarding CNW's October 6, 2003 self-disclosure. Because CNW, Inc. currently employs fewer than 100 individuals, The United States Environmental Protection Agency (U.S. EPA) is evaluating your self-disclosure under the Small Business Compliance Policy, 65 Fed. Reg. 19630 (April 11, 2000), as allowed for under Section C of that policy.

I have also received a copy of your December 8, 2003 letter directed to Tinka Hyde, Regional Team Manager, in which you described the corrective measures taken by CNW to this date. In order to complete our evaluation please submit the following additional information and documentation within ten business days:

1. A copy of the Stormwater Pollution Prevention Plan completed on November 4, 2003.
2. Copies of EPCRA 313 Form Rs submitted to U.S. EPA and Ohio EPA along with proof of delivery.
3. Documentation of hazardous waste management training conducted in December, 2003, for all employees involved in any type of hazardous waste management:
 - a. Names and job titles of employees who received hazardous waste management training and any documentation of that training:

- b. Copies of the curriculum used to train employees during the December 2003 training;
- c. The name of the person(s) who provided the employees' hazardous waste training in 2003, and the dates and type of hazardous waste training (formal or informal) which the provider(s) had received.
- 4. A copy of the written procedures CNW developed in November of 2003 for management of Hazardous Waste.
- 5. Copies of annual hazardous waste reports for calendar years 1999-2002 submitted to the State on November 21, 2003 and proof of delivery.
- 6. Updated RCRA generator notification information.

If you have any questions about this request, please contact me at (312)886-6829.

Sincerely,



Erik Olson
Assistant Regional Counsel

Enclosure

cc: Erik Hardin, AE-17J
Brian Gangwisch, DE-9J
Maynard Shaw, DT-8J
Duane Heaton, WC-15J

KMK | Keating, Muething & Klekamp PLL
ATTORNEYS AT LAW

BRIAN M. BABB
DIRECT DIAL: (513) 579-6963
FACSIMILE: (513) 579-6457
E-MAIL: BBABB@KMKLAW.COM

February 23, 2004

Via Federal Express

Mr. Erik Olson
Assistant Regional Counsel
Office of Regional Counsel
United State Environmental Protection Agency
Region 5
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

RE: Voluntary Disclosure of Noncompliance – CNW, Inc. and CNW Acquisition, Inc.

Dear Mr. Olson:

This letter serves to respond to your letter of February 11, 2004 (copy enclosed) which requested documentation of the corrective measures taken by CNW as a result of its voluntary environmental self-disclosure of noncompliance. The requested documentation is enclosed for your review and consideration.

Should you have any questions or need additional information, please contact me.

Very truly yours,

KEATING, MUETHING & KLEKAMP, P.L.L.

By: Brian M. Babb
Brian M. Babb

1224143.1

Environmental Consultant and Trainer

Walter E. Bowles III, P.E.
Webco Environmental Management, Inc.

Specializes in assisting manufacturers to comply with environmental regulations in a manner which conserves and efficiently uses their financial and personnel resources with over 18 years experience. Areas of expertise include: conducting compliance audits; obtaining permits; preparing technical documents (i.e. contingency, spill prevention and waste minimization plans); conducting transactional due diligence investigations; interpreting regulations; preparing reporting submittals; performing site assessments to evaluate soil/ground water contamination; providing technical assistance to legal counsel; developing and conducting training programs; assessing pollution prevention opportunities; and designing waste treatment and recycling systems.

Mr. Bowles was the primary technical author of the "ENVIROPRINT Ohio - A Self-Help Guide to Environmentally Sound Operations" manual developed for Ohio printers. Mr. Bowles was a key presenter at regional training seminars for the project, which is targeted to assist 1,000 printers.

Prior to starting WEBCO Environmental Management, Inc. in 1993, Mr. Bowles played a key role in managing and leading the environmental affairs of a \$1.6 billion business unit of a Fortune 500 manufacturer with 38 manufacturing operations in 18 states. He was also associated with two national environmental consulting firms recognized as leaders in the areas of design/construction remediation, regulatory management, due diligence and site assessment services.

Education: University of Michigan ~ M.S.E., Environmental Engineering, 1986
Vanderbilt University ~ B.E., Environmental & Water Resources Engineering, 1984

Professional Registration: Professional Engineer in Ohio and Indiana.

Detailed Experience

Compliance Reviews:

- Conducted reviews of manufacturing operations, prepared and presented summary reports of findings to management and/or legal counsel.
- Worked with operations personnel to modify work practices, obtain permits and document compliance efforts.
- Managed and reviewed work of external consultants.
- Conducted audits of hazardous waste treatment, storage and disposal operations and recommended preferred disposal options to reduce financial liability.

Permitting:

- Developed permit strategies and prepared Title V, FESOP, state operating and construction permit applications for various sources emitting VOCs, NO_x, particulates, and HAPs.
- Evaluated and prepared control requirement analyses (BAT, RACT, LAER and MACT).
- Developed emission inventories and determined emission factors for major/minor source determination.
- Identified and documented "exempt" air contaminant sources.
- Prepared applications to "bank" emission credits for future sale or use.

Walter E. Bowles III, P.E.

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Permitting (con't):

- Experience includes major and minor stationary sources, located in attainment and non-attainment areas.
- Primary technical contact and interface with permitting agency.
- Negotiated control, permit and recordkeeping requirements.
- Negotiated consent orders to resolve non-compliance situations.
- Prepared construction and discharge permit applications for various wastewater discharges.
- Conducted water usage and discharge surveys in conjunction with preparing NPDES permit applications.
- Assisted in preparing RCRA Part B permit applications for storage facilities.

Plan Preparation:

- Developed, reviewed and approved various regulatory compliance plans including: corrective action; hazard communication; hazardous waste contingency and waste minimization; emergency action; emergency response; remedial investigation; SPCC; storm water pollution prevention and hazard communication.
- Identify ways to consolidate similar plans (or elements) to reduce administrative burden.

Property Transfers:

- Completed Phase I environmental assessments for buyers and sellers of commercial real estate. Coordinated and managed Phase II site investigations.
- Performed compliance and due diligence reviews in conjunction with manufacturing acquisitions in the U.S., United Kingdom, Ukraine, and People's Republic of China.
- Analyzed environmental liabilities and reported findings to manufacturing management, lending institutions and legal counsel.
- Assisted legal counsel in modifying purchase contracts to minimize assumed liabilities.

Regulatory Guidance:

- Interpreted local, state and federal regulations and assess impact to manufacturing operations. Reviewed and commented on proposed regulations and control technologies.
- Developed compliance programs and guidance memorandums, worked with manufacturing operations to implement required actions.
- Created customized compliance procedures to simplify and clarify environmental responsibilities, improve effectiveness, and integrate with ISO 9000/14000.

Reporting:

- Prepared and reviewed SARA 311, 312 and 313 "Form R" reporting documents.
- Explained new "Form R" pollution prevention reporting requirements to manufacturing personnel and answered technical questions on completing forms.
- Managed monitoring equipment, collected data and prepared NPDES monthly discharge monitoring reports.
- Developed spreadsheets to report quarterly and annual VOC emissions.
- Negotiated record keeping requirements and established systems to determine VOC emissions from inventory and usage records.

Walter E. Bowles III, P.E.

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Site Assessment:

- Performed Phase I, II and Transaction Screen Environmental Site Assessments.
- Managed removal and closure of gasoline, fuel oil and solvent USTs.
- Hired subcontractors and supervised field activities. Coordinated disposal/recycling of tank, contents and impacted soils.
- Completed post excavation sampling and submitted closure reports.
- Assisted in developing remedial investigation work plans.
- Developed soil sampling and ground water monitoring well locations.
- Determined sampling parameters and frequencies.
- Managed soil sample collection and ground water monitoring well installation, development and sampling.
- Interpreted results, compiled data and prepared reports for regulatory agencies.

Technical Oversight:

- Provided assistance to internal and external legal counsel on remediation issues, including Superfund site involvement.
- Coordinated compliance reviews, non-compliance discovery and corrective action with internal counsel to minimize liability.
- Assisted in negotiating consent orders to resolve non-compliance situations.

Training:

- Pushed to develop standardized training programs within corporation to reduce duplicate efforts spent developing and revising facility programs.
- Lead development of corporate DOT training manual for manufacturing managers to use to train affected personnel.
- Developed and reviewed various training programs including hazard communication, spill response and reporting, hazardous waste management and storm water pollution prevention.
- Responsible for training environmental coordinators/managers with air compliance, hazardous waste management compliance, right-to-know compliance, and DOT compliance at manufacturing locations.

Treatment Systems:

- Designed and evaluated systems and technologies to treat organics, metals, and solids from air, hazardous and solid waste, waste water, storm water and ground water.
- Prepared detailed cost estimates to compare treatment alternatives.
- Supervised the installation of 650 gpm air stripper to remove TCE from ground water prior to distribution into public drinking water supply.
- Worked as operations coordinator for low temperature thermal desorption soil remediation unit which successfully completed soil treatment activities at a northeastern Superfund site.

Environmental Hazardous Waste Training

Environmental Training

CNW, Inc.
4710 Madison Road
Cincinnati, OH 45227

Topics for Training

- General Environmental Management;
- Responding to Emergencies;
- Managing Hazardous Waste;
- Department of Transportation Requirements; and
- Storm Water Requirements.

Environmental Policy

- Conduct business and operations in compliance with local, state and federal environmental regulations;
- Provide appropriate resources (training, written guidelines/procedures, and equipment) to enable employees to operate business in accordance with environmental requirements;

Environmental Policy (con't)

- All employee's adhere to CNW Environmental Policy; and
- Any questionable or non-compliance activity is to be reported immediately to management.

Hazardous Waste

“Cradle to Grave”

- Hazardous waste regulations manage hazardous waste from it's point of creation ('cradle') to its final disposal ('grave');
- Puts financial responsibility on CNW ('generator') for the life of the waste ('cradle to grave').

CNW's Haz Waste

- Hazardous Waste regulations are established by:
 - Ohio Environmental Protection Agency; and
 - U.S. Environmental Protection Agency
- Any questions on proper waste management practices must be directed to Dan Bressert;
- CNW is developing written procedures (an Environmental Plan of Control) to properly manage hazardous waste;
- All employees are required to adhere to Company procedures and properly handle, manage and dispose of hazardous waste.

Regulated Wastes at CNW

- **Hazardous Wastes:**

- Spent inks and solvents
- Chromic Acid
- Wastewaters generated from copper and chrome operations
- Wastewater Sludge
- Film processor with silver recovery canister
- Plating tank sludge's
- Copper plating solution

- **Universal Wastes (40 CFR 273)**

- Fluorescent bulbs
- Batteries
- Thermostats

Regulated Wastes at CNW

- **Non-Hazardous Wastes:**

- General trash (solid waste)
- Dirty rags (sent off-site for laundering and reuse)
- Waste oil
- Scrap copper/shavings
- Scrap steel/shavings

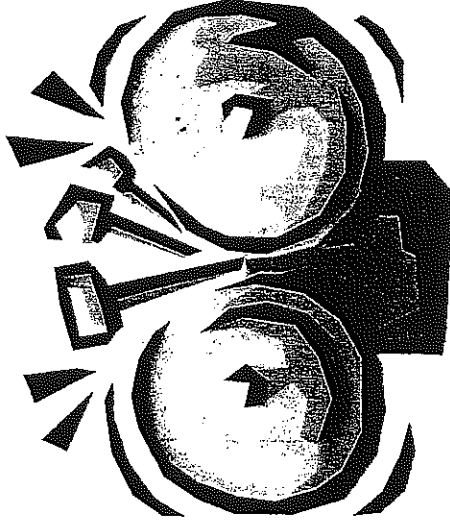
Handling Hazardous Waste

- Before using a new drum:
 - inspect
 - remove old labels
 - properly (re) label the drum
- When filling or emptying waste drums:
 - use proper protective equipment
 - be careful
- When moving wastes:
 - ensure bung/lid are tightly secured
- Label all drums:
 - hazardous waste
 - name of the waste
 - beginning accumulation date
- Keep containers closed at all times
- Check posted waste accumulation procedure



Types of Emergency Situations

- Any spill (regardless of the quantity) outside of a building or in an area which could drain to a sewer; and
- Any spill or situation which concerns you or you perceive as being a health or safety hazard;



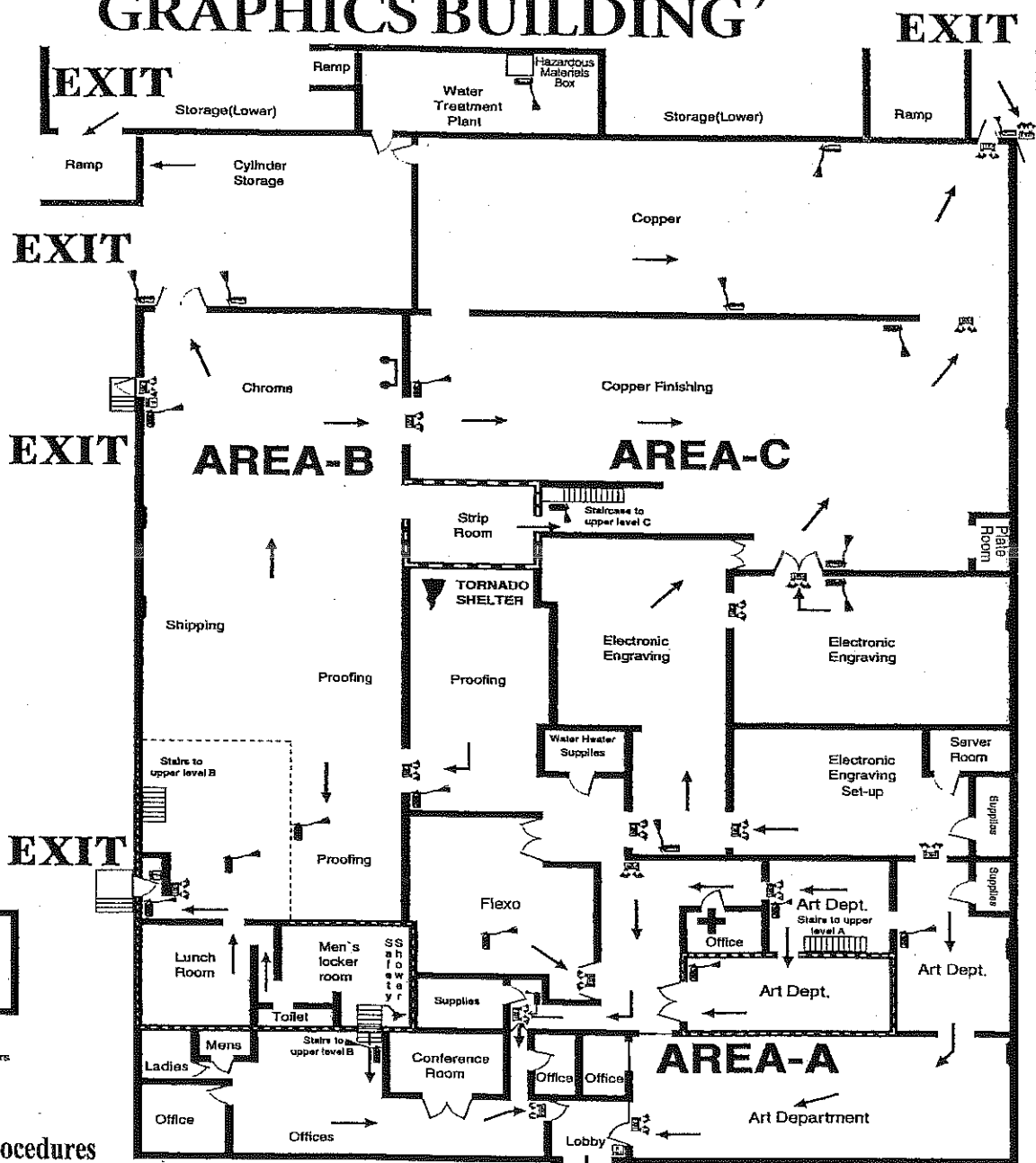
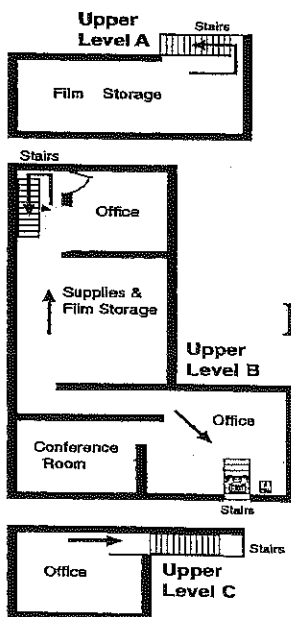
What to Do in an Emergency

- Assess the severity of the spill/release;
- Spills which do not pose a significant safety or health hazard to those in the immediate vicinity and can be cleaned up by those familiar with the chemical's safety and health hazardous are "incidental" spills;
- For non-incidental spills, or other emergency situations (such as fire, severe weather), immediately notify (use the "Page" button on the nearest phone) the Emergency Coordinator (or alternates) and instruct employees to evacuate the area;
- For non-incidental spills, evacuate the area and await instruction from the emergency coordinator who will contact the appropriate local emergency response agency(s);
- The following page shows emergency equipment and evacuation routes:

Emergency Response Equipment

- <<Insert Site Plan with Emergency Exits>>

Site Plan GRAPHICS BUILDING



Emergency Procedures

Evacuation

If announced (by person or over the PA system) to evacuate the facility, proceed to the nearest exit. If the nearest exit is blocked due to the emergency, proceed to the nearest safest exit. Once out of the facility, congregate across Madison Road in the restaurant parking lot for a head count conducted by the Emergency Coordinator or their designee.

Hazardous Material Spill

If the spill can be cleaned up safely by employee(s) in the immediate work area, without a health or safety danger to any employee, no notification is required. Otherwise, evacuate the immediate area, announce the emergency over the PA system (press "Page" on the nearest phone) and contact an Emergency Coordinator from the list below. If directed to do so, contact the Hazmat response contractor listed below.

Fire

In the event of a fire, pull the fire alarm to evacuate other employees from the facility. Follow the evacuation procedure above. Once outside, try to contact an Emergency Coordinator from the list below.

Medical

If someone is ill or injured, contact the Emergency Coordinator. If the individual requires immediate medical attention (i.e. heart attack, stroke, loss of limb, death, etc), EMS must be contacted immediately by dialing 911 from any phone in the facility.

Severe Weather (Tornado, Earthquake, etc.)

In the event of severe weather, turn off all equipment (as time permits) and proceed to the interior of the plant away from equipment. If time does not permit employees to gather in this area, employees should find the safest location near their work area. Locations should be under sturdy tables away from outside walls, windows and hazardous materials.

Flood

In the event of a flood requiring complete evacuation. Follow the evacuation procedure above. Once outside, try to contact an Emergency Coordinator from the list below.

EXIT

EMERGENCY TELEPHONE NUMBERS

FIRE OR MEDICAL RELATED 911

FIRE ALARM ADT 1-800-428-7124

CNW ID # 43954

LOCAL EMERGENCY PLANNING COMMISSION
851-7080

METROPOLITAN SEWER DISTRICT
357-7000

ENVIRONMENTAL PROTECTION AGENCY
EMERGENCY RESPONSE - 1-800-282-9378

OCC NET MEDICAL
RIDGE RD M-F 8-5PM - 841-1122

JEWISH HOSPITAL KENWOOD
EMERGENCY ROOM - 686-3233

HAZMAT CLEANUP CONTRACTOR
CLEAN HARBORS
1-800-645-8265

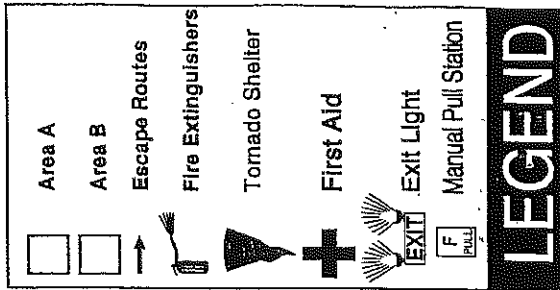
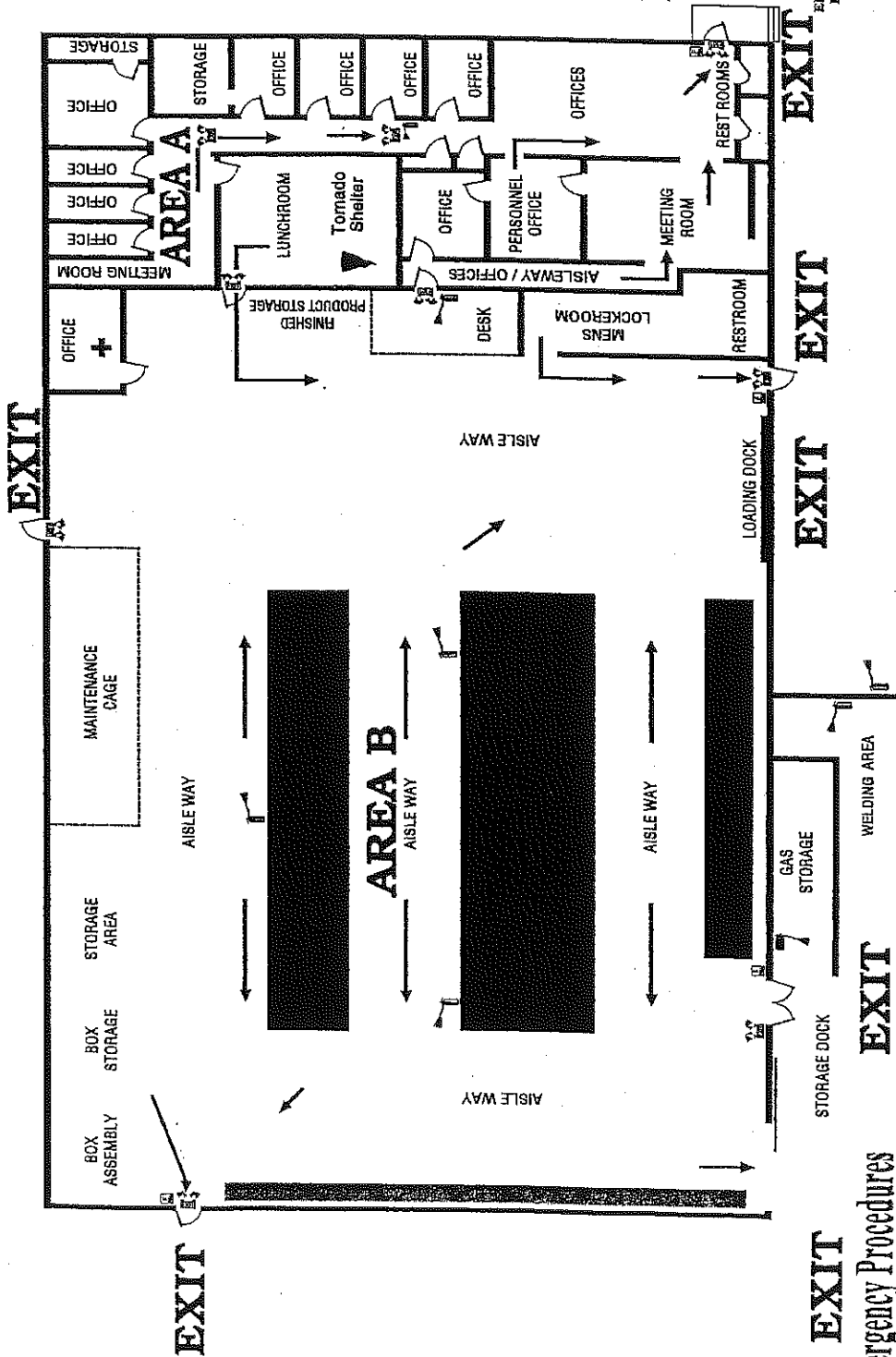
EMERGENCY COORDINATORS

DAN BRESSERT 1-812-744-4445
DENNIS INGERSOL 1-812-623-3443 CELL 1-513-374-3443
DON MOCKBEE 1-812-744-3586
SCOTT NEWTON 385-5107 CELL 513-374-1037 or 315-272

EMERGENCY COORDINATOR ALTERNATES

BRIAN COMBS 753-1368 CELL 513-226-1085
CARL COMBS 753-4018 CELL 513-720-0254
JACK DAVIDSON 631-8314 PAGER 269-0903
JEFF MCCORMICK 242-7232 CELL 513-374-1038
JOHN SECOY 742-9722

Site Plan MACHINE SHOP



EMERGENCY TELEPHONE NUMBERS

FIRE OR MEDICAL RELATED 911
FIRE ALARM ADT 1-800-418-7124
CNW ID # 43954
LOCAL EMERGENCY PLANNING COMMISSION 851-7080
METROPOLITAN SEWER DISTRICT 557-7006
ENVIRONMENTAL PROTECTION AGENCY
EMERGENCY RESPONSE -1-800-282-9378
OCC NET MEDICAL
RIDGE RD M-F 8-5PM - 841-1122
JEWISH HOSPITAL KENWOOD
EMERGENCY ROOM - 686-5133
HAZMAT CLEANUP CONTRACTOR
CLEAN HARBORS
1-800-645-8265
EMERGENCY COORDINATORS
DAN BRESSETT 1-812-744-4445
DENNIS INGERSOL 1-812-623-3443 CELL 1-513-374-3443
DON MOCKBEE 1-812-744-3586
SCOTT NEWTON 385-5107 CELL 513-374-1037 315-2747
EMERGENCY COORDINATOR ALTERNATES
BRIAN COMBS 753-1368 CELL 513-374-1085
CARL COMBS 753-4018 CELL 513-374-0254
JACK DAVIDSON 651-8314 PAGER 359-0903
JEFF MCCORMICK 242-7232 CELL 513-374-1038
JOHN SECOY 742-9712

Emergency Procedures

Evacuation

If announced (by person or over the PA system) to evacuate the facility, proceed to the nearest exit. If the nearest exit is blocked due to the emergency, proceed to the nearest safest exit. Once out of the facility, congregate across Madison Road in the restaurant parking lot for a head count conducted by the Emergency Coordinator or their designee.

Hazardous Material Spill

If the spill can be cleaned up safely by employee(s) in the immediate work area, without a health or safety danger to any employee, no notification is required. Otherwise, evacuate the immediate area, announce the emergency over the PA system (press "Page" on the nearest phone) and contact an Emergency Coordinator from the list below. If directed to do so, contact the Hazmat response contractor listed below.

Fire

In the event of a fire, pull the fire alarm to evacuate other employees from the facility. Follow the evacuation procedure above. Once outside, try to contact an Emergency Coordinator from the list below.

Medical

If someone is ill or injured, contact the Emergency Coordinator. If the individual requires immediate medical attention (i.e. heart attack, stroke, loss of limb, death, etc), EMS must be contacted immediately by dialing 911 from any phone in the facility.

Severe Weather (Tornado, Earthquake, etc.)

In the event of severe weather, turn off all equipment (as time permits) and proceed to the interior of the plant away from equipment. If time does not permit employees to gather in this area, employees should find the safest location near their work area. Locations should be under sturdy tables away from outside walls, windows and hazardous materials.

Flood

In the event of a flood requiring complete evacuation. Follow the evacuation procedure above. Once outside, try to contact an Emergency Coordinator from the list below.

Department of Transportation

- The U.S. Department of Transportation (DOT) regulations apply to CNW for employees responsible for shipping and/or receiving “hazardous materials;
- DOT and OSHA overlap as Hazard Communication (HAZCOM) covers chemicals once inside CNW’s building;
- Increased regulatory scrutiny has resulted from terrorism activities and airline disasters.

What are "Hazardous Materials"

- "Hazardous materials" is a DOT term for any substance or material which has been determined by the Secretary of Transportation to be capable of posing an unreasonable risk to health, safety, and property when transported in commerce;
- Hazardous materials include solvents, inks, acids, chromic acid, caustic - essentially most chemicals used at CNW.

Receiving Hazardous Materials

- Ensure an Material Safety Data (MSDS) sheet is available for each chemical you receive;
- Prior to unloading the truck, have the driver secure the truck (chock wheels) and insure the drain plug is in the storm drain in the shipping/receiving dock area.

Shipping Hazardous Materials

- Before any material is shipped off-site, you must ensure the material is properly labeled and has the required shipping papers.
- Shipping papers and labeling instructions must be provided by either a supervisor or taken from written company procedures;
- All material shipped must be kept inside (and secure) of the CNW facility immediately prior to shipment to prevent tampering.

Storm Water Management

- CNW is required to maintain a storm water permit and maintain a Storm Water Pollution Prevention Plan to minimize the impact from our operation on storm water;
- Given CNW's proximity to the Duck Creek, it is important we properly manage our chemicals and raw materials;
- To the greatest extent possible, we must store materials inside or under cover to prevent contact with storm water.

Storm Water Practices

- Under no circumstances should any chemical be dumped or poured down a storm drain or onto any paved or unpaved area;
- Any employee noticing any spilled material outside of the facility should report this situation immediately to a supervisor;
- Before moving any chemicals outside of the facility, make sure drain covers are in place over the adjacent storm drain(s).

ENVIRONMENTAL
TRAINING.

3pm

Attendance List

Date

12/4/13

Name

Employee #

- | | | |
|----|--------------|--------------------------|
| 1 | Bill Cook | - 2nd Shift Supervisor |
| 2 | Byrd Eady Jr | - 1st Shift Housekeeping |
| 3 | Alon | - 2nd Shift Proofer |
| 4 | | |
| 5 | | |
| 6 | | |
| 7 | | |
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6Am

ENVIRONMENTAL
TRAINING.

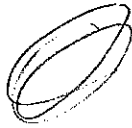
Attendance List

Date 12-4-03

Name

Employee #

1	John Segoy	1252 - 3rd Shift	SUPERVISOR
2	Christopher	640 - 3rd Shift	POLISHMASTER OPERATOR
3	John	625 - 1st Shift	WELDING
4	Martha Phyllis	1304 - 2nd Shift	LATHE
5	Charles Peter	1098 - 2nd Shift	COPPER PLATER
6	Devy Cornell	1727 - 2nd Shift	CHROME PLATER
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ENVIRONMENTAL
TRAINING.

2:30 PM

Attendance List

Date

12/4/83

Name

Employee #

1	<i>Scott Conrad</i>	772	- 1ST SHIFT PROOFER
2	<i>Gregory Vance</i>		- 1ST SHIFT CHROME MGR.
3	<i>Dave Pitt</i>		- 1ST SHIFT PROOFING MGR.
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ENVIRONMENTAL
TRAINING.

2pm

Attendance List

Date

12/4/03

Name

Employee #

- 1 Michaels - 1st Shift Polymaster Operator
- 2 Jeffrey McCall - QUALITY ASSURANCE MGR
- 3 Bryce Lyons - 1st Shift Chrome Plater
- 4 John Danderson - WATER TREATMENT OPERATOR
- 5 Donald Motta - PRODUCTION DIRECTOR
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ENVIRONMENTAL
TRAINING.

Attendance List

Date

12/4/03

1:30 PM

Name

Employee #

1	Dennis Ingersoll	-	MAINTENANCE MAN
2	Tony Guro	-	1ST SHIFT COPPER LATHE
3	De 2 Del	-	1ST SHIFT GRINDER
4	Bryan W. Wagon	-	1ST SHIFT COPPER PLATER
5	Keith Gordon	-	1ST SHIFT MACHINE SUPERVISOR
6	ANTOINE WALKER	-	1ST SHIFT COPPER
7	Sam Cummings	-	1ST SHIFT CHROME STRIPPER PLATER
8	Tony Reime	-	1ST SHIFT CHROME POLISHER
9	Douglas Brunner	-	1ST SHIFT POLISHMASTER OPERATOR
10	276 Mader	-	1ST SHIFT COPPER DEPARTMENT MGR.
11	John Messer	-	1ST SHIFT TRUCK DRIVER / DOCK LABORER
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ENVIRONMENTAL
TRAINING.

Attendance List

Date

12/4/03 1st

Name

Employee #

1	Scott Wanta	611	- DIRECTOR OF OPERATIONS
2	Dan Bruns	699	- ENVIRONMENTAL MANAGER
3	Gerald Moore	352	- 1ST SHIFT COPPER LATHE
4	Rich Jordan	132	- 1ST SHIFT COPPER / SAFETY MANAGER
5	Robert L. Siefert	648	- 1ST SHIFT COPPER PLATER
6	Clayton Z. Bahr	834	- 1ST SHIFT BOX MAKER
7	Victor Becker	-	- 1ST SHIFT PROCESS ENGINEER
8	CARL Comb S	689	- 1ST SHIFT TRAFFIC MGR / ASST SAFETY
9	Jim Peters	716	- 1ST SHIFT INSPECTOR
10	Jeff North	1259	- 1ST SHIFT CYLINDER PROOFER
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ENVIRONMENTAL
TRAINING.

Attendance List

Date

12/4/03 3:30pm

Name

Employee #

- 1 James D Bishop - 1st Shift Proofer
- 2 Donnie Mochlee JR - 2nd Shift Proofer
- 3 Tracy Carney - 2nd Shift Chrome Stripping
- 4 Andrew Perkins - 2nd Shift Chrome Polishing
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Hazardous Waste Management

Chapter 5

Hazardous, Non-Hazardous, and Universal Waste

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5.12.0 Program Overview

The CNW, Inc. (CNW's) Cincinnati, Ohio facility generates hazardous, non-hazardous, and universal waste. CNW generates less than 1,000 kilograms of hazardous waste per calendar month and, therefore, meets the regulatory classification of a small quantity generator ("SQG"). The facility is subject to requirements which include:

- Identifying wastes produced (generated) at the facility and determining the type (e.g. hazardous, universal) of waste;
- Specific practices for collecting, labeling, managing and shipping (for disposal) waste materials;
- Documenting recordkeeping and reporting requirements; and
- Training for employees managing and working with hazardous wastes.

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5.1 Program Management

Mr. Dan Bressert is responsible for all aspects of the hazardous waste, universal waste, used oil, and non-hazardous waste management.

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5.2 Regulated Equipment/Processes

Equipment	Location
Satellite accumulation drum for waste ink/solvent	Proof press area
Hazardous waste accumulation area used to stage hazardous waste drums and super sack (for electroplating sludge) prior to offsite disposal.	Wastewater treatment area
Wastewater treatment system (equipment is a totally enclosed treatment facility and is exempt from regulation as a treatment system) for processing spent plating solutions and wastewater from electroplating operations.	Wastewater treatment area.

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5.3 Applicable Regulations

The Ohio hazardous waste regulations are included in the Ohio Administrative Code (OAC). The following regulations govern hazardous waste in Ohio:

Title of Regulation	Regulatory Citation

Hazardous Waste Management System – General	OAC 3745-50
Identification and Listing of Hazardous Waste	OAC 3745-51
Standards Applicable to Generators of Hazardous Waste	OAC 3745-52
Standards Applicable to Transporters of Hazardous Waste	OAC 3745-53
Standards for Owners and Operators of Hazardous Waste Storage, Treatment and Disposal Facilities	OAC 3745-54-57
Interim Status Standards for Owners and Operators of Hazardous Waste Treatment, Storage and Disposal Facilities	OAC 3745-65
Land Disposal Restrictions	OAC 3745-270
Standards for Universal Waste Management	OAC 3745-273
Standards for the Management of Used Oil	OAC 3745-279

CNW will either maintain a copy of these regulations on-site or provide for electronic access.

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5.4 Regulatory Agencies

The State of Ohio is authorized to oversee the hazardous waste program. All aspects of the hazardous waste program are regulated by the:

Ohio Environmental Protection Agency
Southwest District Office
401 East Fifth Street
Dayton, Ohio 45402-2911
Phone: 937-285-6357
Fax: 937-285-6249

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5.5 Required Practices

5.5.1 Waste Determination

CNW is responsible for evaluating each waste stream generated at the facility and determining if it is a hazardous waste. Any time a new waste stream is generated, CNW is responsible for immediately evaluating the waste to determine if it is hazardous, non-hazardous special, or universal waste. This evaluation/determination may be made by using either:

- Testing; or
- Knowledge (Material Safety Data Sheet).

Any records of waste determination such as a MSDS, waste profile, or other information should be maintained for at least three years.

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5.5.1.1 Hazardous Waste Determinations

CNW generates the following hazardous waste which are shipped off-site on a regular basis for disposal :

Hazardous Waste Stream	Waste Characteristic	Documentation/Profile
Waste electroplating sludge (RQ, Hazardous waste solid, n.o.s. (contains chromium), 9, NA 3077, PG III)	F006	Profile
Waste sludge materials from electroplating operations (RQ, Hazardous waste solid, n.o.s. (contains copper cyanide), 9, NA 3077, PG III)	F008	Profile
Waste ink and solvent (RQ, waste flammable liquids, n.o.s. (contains toluene, ethyl acetate), 3, UN1993, PG II)	F003, D001	Profile

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5.5.1.2 Non-Hazardous Waste Determinations

CNW generates the following non-hazardous wastes:

Non-Hazardous Waste Stream	Waste Producing Process	Documentation/Profile
Still bottoms/sludge from plate processing solvent reclamation	Reclamation of solvent used in processing of flexographic printing plates.	MSDS for Solvit (plate processing solvent), flash point for material is greater than 140 deg. F.
Shop towels	Use of shop towels for cleaning cylinders and metal parts	Shop towels are collected by a commercial laundry, cleaned and returned to CNW for reuse.
Used oil	Waste lubricating and hydraulic oils	Oils do not contain excess halogens (< 1000 ppm) or mixed with solvents.
Metal shavings	Steel and copper shavings are generated as part of machining of steel and stripping of cylinder bases.	Materials are collected and sent off-site for recycling by Bluegrass Recycling.
Oil containing pigs/socks and absorbant	Pigs and absorbants used to collect miscellaneous cutting and lubricating oils from around machining (lathes, etc.) equipment	Oils do not contain excess halogens (< 1000 ppm) or mixed with solvents and absorbents are not saturated (no free liquids).

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5.5.1.3 Universal Waste Determinations

Universal waste stream	Waste producing process
Batteries	Various locations
Mercury-Containing Thermostats	Replacement of old thermostats

Universal wastes are determined based upon the description of the material (i.e. batteries, etc.), so no further analytical data/documentation is required. As a small quantity handler of universal waste, the facility must collect, less than 5,000 kilograms of universal waste and cannot store waste off-site for recycling/disposal for a period of one year or more.

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5.5.2 Registering and Obtaining an EPA Identification Number/Generator Status

CNW is currently registered with the Ohio EPA as a small quantity generator ("SQG"). If at any time there are changes in the hazardous waste stream that would change the classification of the facility, a Notification of Hazardous Waste Activity Form must be filed with the Ohio EPA.

Form	When to File Form	Regulatory Citation (s)	Determination
RCRA Subtitle C Site Identification Form (Ohio EPA Form 9029)	Filed initially to receive EPA generator identification number. Must be refiled with Ohio EPA in the event of any changes (generator status, ownership, contacts, or waste stream information).	<u>OAC 3745-52-12</u>	<u>Update provided in 2002 hazardous waste annual report submittal on 11-20-2003</u>

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5.5.3 Handling Hazardous, Non-Hazardous, and Universal Waste

CNW is responsible, as well as required by hazardous waste regulations, to properly manage and dispose of the various wastes generated at the facility. The following guidelines apply for all types of wastes generated (Note: hazardous wastes have additional requirements which are discussed subsequently):

1. Do not mix wastestreams (i.e. mixing oil with waste inks/solvent);
2. Immediately after a waste is generated it must be transferred to an appropriate collection container (employees must use appropriate personal protective equipment when handling wastes);
3. The collection container must be labeled to identify the contents;
4. The collection container must be kept closed at all times except when adding or removing a waste to prevent accidental spills;
5. Collection containers should be stored inside, away from floor drains or doors to prevent spills from entering the environment;
6. Spill response equipment (such as absorbent materials) should be kept in close proximity to the stored

containers; and

7. Communication access (phone or other device) should be provided in close proximity to the stored container in the event of an emergency to summon assistance.

For hazardous wastes, a generator is allowed to accumulate up to 55-gallons of hazardous waste, or up to 1 quart of acutely hazardous waste, at the point of generation (and under control of the operator) in a "satellite" accumulation drum. Within 72 hours of the drum becoming full, the satellite accumulation drum must be transferred to the facility's central accumulation (storage) area and the date noted to await pickup for offsite disposal.

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5.5.3.1 Satellite Accumulation

Following are the requirements for satellite accumulation drums:

Requirement	Frequency/Timing	Regulatory Citation
Containers are closed, except when adding or removing waste.	At all times	3745-52-34
Containers are in good condition and compatible with the waste.	At all times	
Container marked as "Hazardous Waste" or with other words that identify the content of the container.	At all times	
Quantity accumulated not to exceed 55 gallons (or 1 quart of acutely hazardous waste).	At all times	
Satellite container is moved to central accumulation (storage) area within 72 hours of becoming full.	At all times	

CNW currently accumulates the following hazardous wastes in a regular basis within the facility as follows:

Waste Stream	Satellite Accumulation Drum Location	Posting
Waste ink and solvent	Proof press area	<u>Waste Ink Accumulation Procedure</u>
Waste electroplating sludge	Wastewater treatment area (below sludge dryer), although CNW does not manage the Super Sack as a satellite collection container but rather as a standard accumulation container.	<u>Waste Electroplating Sludge Accumulation Procedure</u>

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5.5.3.2 Used Oil

Used oil is collected in 55-gallon drums prior to being shipped off-site for disposal by Detrex Corporation in Indianapolis. These drums should be kept closed at all times, unless adding oil, and labeled "Used Oil." Information on disposing of the used oil is included in 5.5.6 and 5.5.8.

CNW does not maintain oil in a quantity exceeding 1,320 gallons and, therefore, is not required to maintain a Spill Prevention Control and Countermeasure (SPCC) Plan.

Used oil filters should be drained completely so that there is no visible sign of free flowing oil remaining. This may require physically manipulating (i.e., puncturing, etc.) the filter to drain hard to access portions of the filter. When all free flowing oil has been removed, the non-terne filters can be disposed of with non-hazardous waste.

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5.5.3.3 Spent Fluorescent Bulbs

The following are procedures CNW should use in managing its spent fluorescent light bulbs:

1. Put the spent bulbs back into the original packaging to prevent breakage;
2. Label the package as "Fluorescent Light Bulbs" with the date the waste was put into the package;
3. Store the bulbs carefully in the maintenance department to prevent breakage;
4. Ship the bulbs off-site once each year (e.g. do not store bulbs on-site for more than 12 months);
5. Do not accumulate more than 5,000 kilograms (11,000 pounds) of all universal waste; and
6. Utilize the services of an appropriate recycling service for off-site recycling.

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5.5.3.4 Used Batteries

The following are procedures CNW should use in managing its spent nickel-cadmium and lead-acid batteries:

1. Put the spent batteries into a 5-gallon plastic pail located in the maintenance department;
2. Label the package as "Universal Waste - Batteries" with the date the waste was put into the package;
3. Store the batteries carefully in the maintenance department;
4. Ship the batteries off-site once each year (e.g. do not store batteries on-site for more than 12 months);
5. Do not accumulate more than 5,000 kilograms (11,000 pounds) of all universal waste; and
6. Utilize the services of an appropriate recycling service for off-site recycling.

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5.5.3.5 Mercury-containing Thermostats

The following are procedures CNW should use in managing its mercury-containing thermostats:

1. Put the spent thermostats into a 5-gallon plastic pail located in the maintenance department;
2. Label the package as "Universal Waste - Mercury-Containing Thermostats" with the date the waste was put into the package;
3. Store the thermostats carefully in the maintenance department;
4. Ship the thermostats off-site once each year (e.g. do not store thermostats on-site for more than 12 months);
5. Do not accumulate more than 5,000 kilograms (11, 000 pounds) of all universal waste; and
6. Utilize the services of an appropriate recycling service for off-site recycling.

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5.5.3.6 Empty Drums

Empty drums generated at the facility are either returned to the vendor for a deposit, used for waste disposal, or properly disposed.

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5.4 Inspections

CNW is required to perform weekly inspections of the hazardous waste storage area and inspections as needed of communication equipment.

Description of Requirement	Frequency/Timing	Regulatory Citations	Determination
Inspect hazardous waste accumulation area (document in writing)	By Friday of each Week	<u>OAC 3745-66-74</u>	<u>Inspection Sheet</u> (blank form)
Inspect communication devices and test emergency response equipment (document in writing)	As necessary	<u>OAC 3745-65-33</u>	

Written copies of inspections must be maintained in a central file notebook. These records must be maintained a minimum of three years from the date of inspection.

CNW may accumulate/store hazardous waste for up to 180 days as a SQG and up to 270 days if the waste disposal facility is located greater than 200 miles away, provided the quantity of waste accumulated on-site never exceeds 6,000 kilograms.

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5.5.5 Preparedness, Prevention, and Emergency Contingency/Planning

As a SQG, CNW is required by OAC 3745-52-34(D) to comply with the following:

5.5.5.1 Contingency Plan

As a SQG, CNW is not required to maintain a Contingency Plan as required in OAC 3745-65-50.

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5.5.5.2 Emergency Equipment

CNW's facility must be maintained and operated to minimize the possibility of fire, explosion, and release of hazardous waste. As a hazardous waste generator, CNW is mandated to supply emergency equipment on-site in case of emergency. A site plan including locations of this equipment is maintained in the Contingency Plan in Chapter 3 of this manual. Emergency equipment must be tested and maintained regularly to ensure its proper operation in an emergency. CNW's facility is required to have the following equipment available at the accumulation area:

Requirement	Citation	Determination
At all times there must be at least one employee either on the premise or on call designated as the "Emergency Coordinator"	3745-52-34(D)(5)(a)	Emergency response information is provided on Facility Evacuation Map posted adjacent to facility's central hazardous waste accumulation (storage) area at the wastewater treatment department.
Post the following information next to the telephone: name and telephone number of the emergency coordinator, location of fire extinguishers and spill control material, and, if present, fire alarm(s); and the telephone number of the fire department, unless the facility has a direct alarm	3745-52-34(D)(5)(b)	
Ensure all employees are thoroughly familiar with proper waste handling and emergency procedures, relevant to their responsibilities during normal facility operations and emergencies	3745-52-34(D)(5)(c)	
Respond appropriately to emergencies	3745-52-34(D)(5)(d)	
Maintain and operate facility in a manner to minimize the possibility of fire, explosion or other unplanned or sudden release of hazardous waste	3745-65-31	
Have available at the accumulation/storage area: internal communication device or alarm to communicate with employees as well as contact police/fire or response assistance; portable fire extinguishers and spill control equipment; and water at adequate volume and pressure to supply hose streams, sprinklers, or spray systems.	3745-65-32	
Facilities must test and maintain emergency equipment	3745-65-33	Documented on weekly hazardous waste inspection.
Provide access to communication equipment whenever hazardous waste is being handled and to at least one employee at all times.	3745-65-34	Telephone located adjacent to wastewater treatment area.
Provide aisle space in accumulation/storage area to allow unobstructed movement.	3745-65-35	Work practice
Document arrangements with local authorities to familiarize them with the operation.	3745-65-37	Planning documentaion.

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5.5.6 Arranging for Hazardous, Non-Hazardous, and Universal Waste Disposal

Under the hazardous waste regulations, a generator is responsible for its hazardous waste from "cradle to grave." As a generator, CNW maintains liability for its hazardous waste after it is shipped off-site for disposal. CNW should evaluate any disposal company before shipping its hazardous waste. The disposal company should not be changed except under extenuating circumstances. Currently, CNW uses the following companies for transportation and disposal of its hazardous waste, non-hazardous waste, and universal waste:

Name	Address	Telephone/Fax	Waste Streams
Envirite of Ohio, Inc.	2050 Central Avenue SE	800-715-5805	Electroplating wastewater

OHD 980 568 992	Canton, OH 44707		sludge, sludge from plating tanks
Reclaimed Energy Co., Inc. IND 000 780 403	1500 Western Avenue Connersville, IN 47331	765-825-7101	Waste ink and solvent
Detrex Corporation IND 085 616 837	2263 Distributors Drive Indianapolis, IN 46241	317-241-9379	Waste oil (non-hazardous)

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5.5.7 Pre-Transport Requirements

For all hazardous wastes, CNW should attempt to use the original drum containing the material, provided the drum is in good condition with no signs of leakage, to transport the waste. Universal Wastes should be packaged in their original packaging or other packaging sufficient to protect the material from being damaged and/or spilled.

CNW should provide disposal companies with five days lead time to schedule a hazardous waste pickup. CNW is responsible for ensuring each hazardous waste drum has a fully completed hazardous waste label, that the drum meets Department of Transportation requirements, and that the transportation vehicle is appropriately placarded.

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5.8 Shipping Hazardous, Non-Hazardous, and Universal Waste Off-Site

Shipment of hazardous wastes must include the use of a hazardous waste manifest and landban notification form. Manifests and associated landban notification forms are normally provided by the disposal companies. CNW has maintained initial copies of landban notifications with initial waste shipments to each disposal company, therefore subsequent landban notifications are not required for each shipment. All hazardous waste shipments are recorded on the facility's manifest log form.

CNW must maintain a signed copy of the manifest and receive a signed copy from the treatment, storage and disposal (TSD) facility. If a signed copy of the manifest is not received within 60 working days from the date of shipment, an exception report will be filed with Ohio EPA to indicate that a signed copy of the manifest has not been received.

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5.5.9 Hazardous Waste Minimization Plan

As a SQG, CNW is not required to maintain a formal hazardous waste minimization plan. CNW monitors generation of the wastewater treatment sludge to minimize chemical additives and thereby minimize the amount of sludge produced.

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5.5.10 Non-Hazardous Waste Generation

Although not regulated by the Ohio EPA in the same manner as hazardous waste, CNW must responsibly dispose

of its non-hazardous wastes.

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5.6 Recordkeeping

CNW is required to maintain the following records:

Description of Requirement	Frequency/Timing	OAC Regulatory Citations	Determination
Original Signed copy of manifest	At least three years or until signed copy from accepting facility is received	<u>3745-52-40(A)</u>	Records maintained by Dan Bressert
Signed copy of manifest from facility accepting waste	At least three years	<u>3745-52-40(A)</u>	
Exception Report	At least three years	<u>3745-52-40(B)</u>	
Annual Report	At least three years	<u>3745-52-40(B)</u>	
Weekly inspections of Hazardous Waste accumulation Areas	At least three years	<u>3745-66-74</u>	
Inspections of Emergency Equipment	At least three years	<u>3745-65-33</u>	
Test results	At least three years	<u>3745-52-40</u>	
Waste analysis and characterization determinations	At least three years from the date that the waste was last sent to on-site or off-site treatment, storage, or disposal	<u>3745-52-40</u>	
Job titles of positions related to hazardous wastes and name(s) of employee(s) filling the position	At all times	<u>3745-65-16</u>	
Written job description for each title including requisite skill, education, or other qualifications and job duties including initial and follow-up training	At all times	<u>3745-65-16</u>	
Records of training to meet above requirements	Until closure of the facility or 3 years after the employee	<u>3745-65-16</u>	

	leaves		
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5.7 Reporting

As a SQG, CNW is required only to submit a Manifest Exception Report submit the following reports:

Requirement	Frequency/Timing	Citation	Determination
Annual report (only if CNW triggers "LQG" status)	March 1st, annually	<u>3745-52-41</u>	Historical reports - 2002; 2001; 2000, 1999
Manifest Exception Report	Submitted if signed copy of manifest is not received from TSD within 60 days	<u>3745-52-42</u>	Only required if manifest not received within 60 days.

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5.8 Permits/Registrations

CNW is currently registered with the Ohio EPA as a SQG and has been issued generator ID number: **OHD 982 01 296.**

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5.9 Training

CNW is required to provide training to all current and new employees to ensure facility compliance with the required Hazardous Waste Regulations. The training must teach employees hazardous waste management procedures relevant to the employee's position and required emergency procedures. The employees must be trained:

- Initially within 6 months of their assignment to a position that includes hazardous waste responsibilities; and
- Annually thereafter.

CNW has elected to provide all employees with environmental management training, which includes proper management of hazardous wastes. In addition, Mr. Bresset and other management personnel who perform hazardous waste management duties such as recordkeeping and reporting, supplement their training with the information provided in this Plan of Control document.

Description of Requirement	Frequency/Timing	Regulatory Citations	Determination
Train employees involved with management of	Training within the first six months of employment and an	<u>OAC 3745-65-16</u>	

hazardous waste (see job description list in Appendix G)	annual review of training thereafter		Training records maintained by Dan Bressert
Must have at least one employee trained as the emergency coordinator, able to respond in the event of an emergency	At all times	<u>OAC 3745 -65-55</u>	

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5.10 Sampling/Monitoring/Testing

Samples of hazardous waste sent off-site for the purpose of determining applicability of the regulations are exempt from the hazardous waste regulations. The samples must be shipped following Department of Transportation regulations.

Any records of waste determination received from testing waste samples must be maintained for at least three years from the date the waste was last sent for treatment, storage, or disposal.

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5.11 Emission Limitations

No emission limitations required.

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5.12 Operation and Maintenance (O&M)

No operation and maintenance procedures required.

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Updated 02/17/04

Waste Accumulation Procedure

Ink and Solvent

1. Using appropriate PPE, immediately and completely transfer any remaining ink in the proof press or unusable ink into a 55-gallon closed-top drum located within the Proof Press area. Any unusable cleanup solvent must also be immediately transferred into the accumulation drum;
2. The drum must be labeled with a yellow hazardous waste label;
3. Ensure the following information is included on the label:

Name: CNW, Inc.

Address: 4710 Madison Road

Phone: 513-321-2775

City: Cincinnati

State: OH

Zip: 45227

EPA ID No.: OHD 982 601 296

EPA Waste No.: D001, F003

Accumulation Start Date: <<Note – leave this blank until drum is full!>>

DOT Proper Shipping Name: Waste ink and solvent (RQ, waste flammable liquids, n.o.s. (contains toluene, ethyl acetate), 3, UN1993, PG II)

4. Drum must be tightly closed (except when adding waste);
5. Once the drum is full, the date upon which the drum became full must be entered into the “*Accumulation Start Date*” line on the label and the drum must be transferred within 72 hours to the central hazardous waste accumulation area within the dike wastewater treatment area.

Waste Accumulation Procedure

Wastewater Treatment Sludge

1. When a new Super Sack accumulation container is placed under the sludge dryer to collect the waste electroplating sludge, the Super Sack must be labeled with a yellow hazardous waste label;
2. Ensure the following information is included on the label:

Name: CNW, Inc.

Address: 4710 Madison Road

Phone: 513-321-2775

City: Cincinnati

State: OH

Zip: 45227

EPA ID No.: OHD 982 601 296

EPA Waste No.: F006

Accumulation Start Date: Insert date Sack first placed under dryer

DOT Proper Shipping Name: Waste electroplating sludge (RQ, Hazardous waste solid, n.o.s. (contains chromium), 9, NA 3077, PG III)

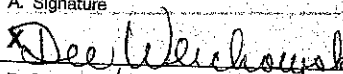
3. Once the Super Sack is full, the Sack is moved to the adjacent central hazardous waste accumulation area.

Weekly Hazardous Waste Inspection Log
CNW, Inc.

	Week / /	Week / /	Week / /	Week / /
Date and Time of Inspection				
Drums/Containers Properly Labeled?				
Oldest Accumulation Start Date?				
Drums/Containers Tightly Closed?				
Drums/Containers Leaking or Deteriorating?				
Adequate Aisle Spacing?				
Eye Wash Working?				
Spill Equipment Available?				
Communication System Working?				
Corrective Action Taken				
Inspector				

[illegible]

Annual Hazardous Waste Reports And Updated RCRA Info

SENDER: COMPLETE THIS SECTION		COMPLETE THIS SECTION ON DELIVERY	
<p>Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.</p> <p>Print your name and address on the reverse so we can return the card to you.</p> <p>Attach this card to the back of the mailpiece, or on the front if space permits.</p> <p>Article Addressed to:</p> <p>OHIO Environmental Protection Agency</p> <p>DIV. OF HAZARDOUS WASTE MGT.</p> <p>P.O. Box 1049</p> <p>Columbus, OH 43216-1049</p>		<p>A. Signature  <input type="checkbox"/> Agent <input type="checkbox"/> Addressee</p> <p>B. Received by (Printed Name) DEE WERCHOWSKI</p> <p>C. Date of Delivery 11-24-03</p> <p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input type="checkbox"/> No</p> <p>RECEIVED OHIO EPA NOV 24 2003</p>	
<p>Article Number (Transfer from service label)</p> <p>7003 1680 0005 6943 2802</p>		<p>3. Service type <input checked="" type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail <input type="checkbox"/> Registered <input type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D.</p> <p>4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes</p>	

Form 3811, August 2001 Domestic Return Receipt 102595-02-M-1540

November 20, 2003

Ohio Environmental Protection Agency
Division of Hazardous Waste Management
P.O. Box 1049
Columbus, OH 43216-1049

Re: Hazardous Waste Annual Report Submittals – CNW, Inc.

Enclosed please find Hazardous Waste Annual Reports for calendar years 2002, 2001, 2000, and 1999 for CNW, Inc. located in Cincinnati, Ohio. These submittals are a result of a voluntary environmental audit conducted at the facility and subsequent disclosure on October 6, 2003 to the Ohio Environmental Protection Agency.

If you have any questions, please contact me directly at 513-321-2775.

Very truly yours,

Scott Newton
Director of Operations

SN/web

Enclosures

MAIL THE COMPLETED FORM TO: Ohio EPA, DHEM, P.O. Box 1049, Columbus, OH 43216-1049	Ohio Environmental Protection Agency RCRA SUBTITLE C SITE IDENTIFICATION		For Ohio EPA Use Only
1. Reason for Submittal	Reason for Submittal: <input type="checkbox"/> To provide initial notification (to obtain an EPA ID Number for hazardous waste, universal waste, or used oil activities). <input checked="" type="checkbox"/> To provide subsequent notification (to update site identification information). <input type="checkbox"/> As a component of a First RCRA Hazardous Waste Part A Permit Application. <input type="checkbox"/> As a component of a Revised RCRA Hazardous Waste Part A Permit Application (Amendment # _____) <input checked="" type="checkbox"/> As a component of the Hazardous Waste Report for the year <u>2002</u>		
2. Site EPA ID No.	EPA ID Number: OHD 982 601 296		
3. Site Name	Name: CNW, Inc.		
4. Site Location Information	Street Address: 4710 Madison Road		
	City, Town, or Village: Cincinnati	State: OH	
	County Name: Hamilton	Zip Code: 45227	
5. Site Land Type	Site Land Type: <input checked="" type="checkbox"/> Private <input type="checkbox"/> County <input type="checkbox"/> District <input type="checkbox"/> Federal <input type="checkbox"/> Indian <input type="checkbox"/> Municipal <input type="checkbox"/> State <input type="checkbox"/> Other		
6. North American Industry Class. System (NAICS) Code(s) for the Site	A. 323122	B.	
	C.	D.	
7. Site Contact Person:	First Name: Scott		MI:
	Phone Number: 513-321-2775		Last Name: Newton
	Phone Number Extension:		
	E-Mail Address: snewton@cnwinc.com		
	Fax Number: 513-321-2013		Fax Number Extension:
	Street or P.O. Box: 4710 Madison Road		
	City, Town or Village: Cincinnati		
8. Legal Owner and Operator of the Site List Additional Owners and/or Operators in the Comment Section or on another copy of this form page.	A. Name of Site's Legal Owner: CNW, Inc.	Date Became Owner (mm/dd/yyyy): NOVEMBER, 1983	
	Owner Type: <input checked="" type="checkbox"/> Private <input type="checkbox"/> County <input type="checkbox"/> District <input type="checkbox"/> Federal <input type="checkbox"/> Indian <input type="checkbox"/> Municipal <input type="checkbox"/> State <input type="checkbox"/> Other		
	Street or P.O. Box: 4710 Madison Road		
	City, Town, or Village: Cincinnati		
	State: OH	Country: USA	Zip Code: 45227
	B. Name of Site's Operator: CNW, Inc.		
	Date Became Operator (mm/dd/yyyy): NOVEMBER, 1983		
	Operator Type: <input checked="" type="checkbox"/> Private <input type="checkbox"/> County <input type="checkbox"/> District <input type="checkbox"/> Federal <input type="checkbox"/> Indian <input type="checkbox"/> Municipal <input type="checkbox"/> State <input type="checkbox"/> Other		
	Street or P.O. Box: 4710 Madison Road		
	City, Town, or Village: Cincinnati		
	State: OH	Country: USA	Zip Code: 45227

CHANGED TO NOV 1ST.

9. Type of Regulated Waste Activity (Mark "X" in the appropriate boxes.)

A. Hazardous Waste Activities

1. Generator of Hazardous Waste

(choose only one of the following three categories)

- ☐ a. Large Quantity Generator (LQG):
Greater than 1,000 kg/mo (2,200 lbs.)
of non-acute hazardous waste; or
- ☒ b. Small Quantity Generator (SQG):
100 to 1,000 kg/mo (220-2,200 lbs.)
of non-acute hazardous waste; or
- ☐ c. Conditionally Exempt Small Quantity Generator (CESQG):
Less than 100 kg/mo of non-acute hazardous waste

In addition, indicate other generator activities
(check all that apply).

- ☐ d. United States Importer of Hazardous Waste
- ☐ e. Mixed Waste (hazardous and radioactive) Generator

2. Hazardous Waste Report Generator Status

(choose one if a Reason for Submittal is the Hazardous Waste Report)

- ☒ a. Large Quantity Generator (LQG):
Greater than 1,000 kg/mo (2,200 lbs.) of non-acute
hazardous waste was generated at the site in any one
month, or
- ☐ b. Small Quantity Generator (SQG)
In one or more months the site generated greater than
100kg (220 lbs) but in no month did it generate more
than 1,000 kg/mo (220-2,200 lbs) of non-acute
hazardous waste, or
- ☐ c. Conditionally Exempt Small Quantity Generator (CESQG):
The site generated no more than 100 kg (220 lbs) of
non-acute hazardous waste in any one month.
- ☐ d. Non-Generator
The site did not generate any hazardous waste during
the calendar year.

For Items 3 through 7, check all that apply:

- ☐ 3. Transporter of Hazardous Waste
- ☐ 4. Treater, Storer or Disposer of Hazardous Waste (at your site) Note: A hazardous waste permit is required for this activity.
- ☐ 5. Recycler of Hazardous Waste (at your site) Note: A hazardous waste permit may be required for this activity.
- ☐ 6. Exempt Boiler and/or Industrial Furnace
- ☐ a. Small Quantity On-site Burner Exemption
- ☐ b. Smelting, Melting, Refining Furnace Exemption
- ☐ 7. Underground Injection Control

B. Universal Waste Activities

1. Large Quantity Handler of Universal Waste.

Indicate types of universal waste generated and/or
accumulated at your site. (check all boxes that apply):

	Generated	Accumulated
a. Batteries	<input type="checkbox"/>	<input type="checkbox"/>
b. Pesticides	<input type="checkbox"/>	<input type="checkbox"/>
c. Thermostats	<input type="checkbox"/>	<input type="checkbox"/>
d. Lamps	<input type="checkbox"/>	<input type="checkbox"/>
e. Other (specify) _____	<input type="checkbox"/>	<input type="checkbox"/>
f. Other (specify) _____	<input type="checkbox"/>	<input type="checkbox"/>
g. Other (specify) _____	<input type="checkbox"/>	<input type="checkbox"/>

☐ 2. Destination Facility for Universal Waste

Note: A hazardous waste permit may be required for this activity.

C. Used Oil Activities

1. Used Oil Transporter

Indicate Type(s) of Activity(ies)

- ☐ a. Transporter
- ☐ b. Transfer Facility

2. Used Oil Processor and/or Re-refiner

Indicate Type(s) of Activity(ies)

- ☐ a. Processor
- ☐ b. Re-refiner

☐ 3. Off-Specification Used Oil Burner

4. Used Oil Fuel Marketer -

Indicate Type(s) of Activity(ies)

- ☐ a. Marketer Who Directs Shipment of Off-Specification
Used Oil to Off-Specification Used Oil Burner
- ☐ b. Marketer Who First Claims the Used Oil Meets the
Specifications

10. **Waste Codes for Federally Regulated Hazardous Wastes.** Please list the codes for the federally regulated hazardous waste handled at your site. List them in the order they are presented in the regulations (e.g., D001, D003, F007, U112). Use an additional page if more space is needed.

D001	D007	F003	F006	F008		

11. Comments

Site met LQG threshold for one month in 2002 (requiring the annual report) but has reverted to SQG status.

12. Certification. I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Signature of owner, operator, or an authorized representative	Name and Official Title (type or print)	Date Signed (mm-dd-yyyy)
<i>Tim Napier</i>	Tim Napier, President	11/21/2003



State of Ohio Environmental Protection Agency

2002 Annual Hazardous Waste Report



PLACE PREPRINTED LABEL HERE OR
ENTER GENERATOR ID NUMBER

0H0982601296

Form GM - Generation and Management

SEC. 1	A. Hazardous waste description (60 characters max.) Sludge generated from treating electroplating wastewaters.				
B. Hazardous waste codes F006					
C. Source code Report the Management Method code ONLY if the Source code is G25. Management Method code H					
D. Waste form code W506			E. RCRA-radioactive mixed Yes No <input checked="" type="checkbox"/>		

SEC. 2	A. Quantity generated in 2001 27460	B. Quantity generated in 2002 21220	C. UOM Density P	D. Was this waste treated, disposed of, or recycled On-site? Yes (continue to system 1) No (skip to SEC. 3) <input checked="" type="checkbox"/>
On-site system 1 RCRA-exempt unit? Yes No		On-site system 2 RCRA-exempt unit? Yes No		
On-site mgmt method H		On-site mgmt method H		

SEC. 3	A. Was any of this waste shipped off-site in 2002? <input checked="" type="checkbox"/> Yes (continue to box B) <input type="checkbox"/> No (skip to SEC. 4)		
Site 1	B. EPA ID of facility to which waste was shipped 0H0980568992	C. Management Method H111	D. Total quantity shipped in 2002 21220
Site 2		H	
Site 3		H	
Site 4		H	
Site 5		H	

SEC. 4		On-site Waste Storage and Inactive Disposal Units																		
If the site has a storage permit or is undergoing a formal closure of storage or disposal units, and waste remained in the unit(s) as of December 31, complete Box A. Otherwise, skip Section 4.		A. As of December 31, did any of this waste remain on-site in: <table border="0"> <tr> <td></td> <td>Yes</td> <td>No</td> </tr> <tr> <td>1. a greater than 90 day storage unit . . .</td> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> </tr> <tr> <td> <input type="checkbox"/> a. generated during 2002</td> <td></td> <td></td> </tr> <tr> <td> <input type="checkbox"/> b. generated prior to 2002</td> <td></td> <td></td> </tr> <tr> <td>2. an inactive disposal unit undergoing closure</td> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> </tr> </table>					Yes	No	1. a greater than 90 day storage unit . . .	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> a. generated during 2002			<input type="checkbox"/> b. generated prior to 2002			2. an inactive disposal unit undergoing closure	<input type="checkbox"/>	<input type="checkbox"/>
	Yes	No																		
1. a greater than 90 day storage unit . . .	<input type="checkbox"/>	<input type="checkbox"/>																		
<input type="checkbox"/> a. generated during 2002																				
<input type="checkbox"/> b. generated prior to 2002																				
2. an inactive disposal unit undergoing closure	<input type="checkbox"/>	<input type="checkbox"/>																		
B. Storage or disposal method	Handling Code	Amount	UOM	Density																
1	<input type="text"/>	<input type="text"/>	<input type="text"/>	lbs/gal <input type="text"/>	sq <input type="text"/>															
2	<input type="text"/>	<input type="text"/>	<input type="text"/>	lbs/gal <input type="text"/>	sq <input type="text"/>															
3	<input type="text"/>	<input type="text"/>	<input type="text"/>	lbs/gal <input type="text"/>	sq <input type="text"/>															
4	<input type="text"/>	<input type="text"/>	<input type="text"/>	lbs/gal <input type="text"/>	sq <input type="text"/>															

Comments:

Extra Waste Codes:



State of Ohio Environmental Protection Agency

2002 Annual Hazardous Waste Report



PLACE PREPRINTED LABEL HERE OR
ENTER GENERATOR ID NUMBER

0H0982601296

Form GM - Generation and Management

SEC. 1	A. Hazardous waste description (60 characters max.) Debris (sludge) from plating tanks.		
B. Hazardous waste codes 0007			
C. Source code Report the Management Method code ONLY if the Source code is G25. Management Method code G03 H			
D. Waste form code W506		E. RCRA-radioactive mixed Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	

SEC. 2	A. Quantity generated in 2001 0	B. Quantity generated in 2002 790	C. UOM Density P lbs/gal <input type="checkbox"/> kg <input type="checkbox"/>	D. Was this waste treated, disposed of, or recycled On-site? <input type="checkbox"/> Yes (continue to system 1) <input checked="" type="checkbox"/> No (skip to SEC. 3)
On-site system 1 RCRA-exempt unit? Yes <input type="checkbox"/> No <input type="checkbox"/>		On-site system 2 RCRA-exempt unit? Yes <input type="checkbox"/> No <input type="checkbox"/>		
On-site mgmt method H		Quantity treated, disposed or recycled in 2002 On-site mgmt method H		

SEC. 3	A. Was any of this waste shipped off-site in 2002? <input checked="" type="checkbox"/> Yes (continue to box B) <input type="checkbox"/> No (skip to SEC. 4)		
Site 1	B. EPA ID of facility to which waste was shipped 0H0982601296	C. Management Method H	D. Total quantity shipped in 2002 990
Site 2		H	
Site 3		H	
Site 4		H	
Site 5		H	

SEC. 4		On-site Waste Storage and Inactive Disposal Units																		
If the site has a storage permit or is undergoing a formal closure of storage or disposal units, and waste remained in the unit(s) as of December 31, complete Box A. Otherwise, skip Section 4.		A. As of December 31, did any of this waste remain on-site in: <table border="0"> <tr> <td></td> <td>Yes</td> <td>No</td> </tr> <tr> <td>1. a greater than 90 day storage unit . . .</td> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> </tr> <tr> <td> <input type="checkbox"/> a. generated during 2002</td> <td></td> <td></td> </tr> <tr> <td> <input type="checkbox"/> b. generated prior to 2002</td> <td></td> <td></td> </tr> <tr> <td>2. an inactive disposal unit undergoing closure</td> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> </tr> </table>					Yes	No	1. a greater than 90 day storage unit . . .	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> a. generated during 2002			<input type="checkbox"/> b. generated prior to 2002			2. an inactive disposal unit undergoing closure	<input type="checkbox"/>	<input type="checkbox"/>
	Yes	No																		
1. a greater than 90 day storage unit . . .	<input type="checkbox"/>	<input type="checkbox"/>																		
<input type="checkbox"/> a. generated during 2002																				
<input type="checkbox"/> b. generated prior to 2002																				
2. an inactive disposal unit undergoing closure	<input type="checkbox"/>	<input type="checkbox"/>																		
B. Storage or disposal method	Handling Code	Amount	UOM	Density																
1	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/> (lb/gal) <input type="text"/> sg																
2	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/> (lb/gal) <input type="text"/> sg																
3	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/> (lb/gal) <input type="text"/> sg																
4	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/> (lb/gal) <input type="text"/> sg																

Comments:

Extra Waste Codes:



State of Ohio Environmental Protection Agency

2002 Annual Hazardous Waste Report



PLACE PREPRINTED LABEL HERE OR
ENTER GENERATOR ID NUMBER

040982601296

Form **GM** - Generation and Management

SEC. 1	A. Hazardous waste description (60 characters max.) Waste ink and solvent from proofing operations.			
B. Hazardous waste codes 0001 F003				
C. Source code Report the Management Method code ONLY if the Source code is G25. G06 Management Method code H				
D. Waste form code WZ01			E. RCRA-radioactive mixed Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	

SEC. 2	A. Quantity generated in 2001 1165	B. Quantity generated in 2002 330	C. UOM Density 6 7.4 lbs/gal <input type="checkbox"/> kg <input type="checkbox"/>	D. Was this waste treated, disposed of, or recycled On-site? <input type="checkbox"/> Yes (continue to system 1) <input checked="" type="checkbox"/> No (skip to SEC. 3)
On-site system 1 RCRA-exempt unit? Yes <input type="checkbox"/> No <input type="checkbox"/>		On-site system 2 RCRA-exempt unit? Yes <input type="checkbox"/> No <input type="checkbox"/>		
On-site mgmt method H Quantity treated, disposed or recycled in 2002		On-site mgmt method H Quantity treated, disposed or recycled in 2002		

SEC. 3	A. Was any of this waste shipped off-site in 2002? <input checked="" type="checkbox"/> Yes (continue to box B) <input type="checkbox"/> No (skip to SEC. 4)		
Site 1	B. EPA ID of facility to which waste was shipped IND000780403	C. Management Method H061	D. Total quantity shipped in 2002 2442 330 lbs.
Site 2		H	
Site 3		H	
Site 4		H	
Site 5		H	

SEC. 4		On-site Waste Storage and Inactive Disposal Units																		
If the site has a storage permit or is undergoing a formal closure of storage or disposal units, and waste remained in the unit(s) as of December 31, complete Box A. Otherwise, skip Section 4.		A. As of December 31, did any of this waste remain on-site in: <table border="0"> <tr> <td></td> <td>Yes</td> <td>No</td> </tr> <tr> <td>1. a greater than 90 day storage unit . . .</td> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> </tr> <tr> <td> <input type="checkbox"/> a. generated during 2002</td> <td></td> <td></td> </tr> <tr> <td> <input type="checkbox"/> b. generated prior to 2002</td> <td></td> <td></td> </tr> <tr> <td>2. an inactive disposal unit undergoing closure</td> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> </tr> </table>					Yes	No	1. a greater than 90 day storage unit . . .	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> a. generated during 2002			<input type="checkbox"/> b. generated prior to 2002			2. an inactive disposal unit undergoing closure	<input type="checkbox"/>	<input type="checkbox"/>
	Yes	No																		
1. a greater than 90 day storage unit . . .	<input type="checkbox"/>	<input type="checkbox"/>																		
<input type="checkbox"/> a. generated during 2002																				
<input type="checkbox"/> b. generated prior to 2002																				
2. an inactive disposal unit undergoing closure	<input type="checkbox"/>	<input type="checkbox"/>																		
B. Storage or disposal method	Handling Code	Amount	UOM	Density																
1	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/> lbs/gal <input type="text"/> sg																
2	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/> lbs/gal <input type="text"/> sg																
3	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/> lbs/gal <input type="text"/> sg																
4	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/> lbs/gal <input type="text"/> sg																

Comments:

Extra Waste Codes:

MAIL THE COMPLETED FORM TO: Ohio EPA, DHWM, P.O. Box 1049, Columbus, OH 43216-1049	Ohio Environmental Protection Agency RCRA SUBTITLE C SITE IDENTIFICATION		For Ohio EPA Use Only
1. Reason for Submittal	Reason for Submittal: <input type="checkbox"/> To provide initial notification (to obtain an EPA ID Number for hazardous waste, universal waste, or used oil activities). <input type="checkbox"/> To provide subsequent notification (to update site identification information). <input type="checkbox"/> As a component of a First RCRA Hazardous Waste Part A Permit Application. <input type="checkbox"/> As a component of a Revised RCRA Hazardous Waste Part A Permit Application (Amendment # _____) <input checked="" type="checkbox"/> As a component of the Hazardous Waste Report for the year <u>2001</u>		
2. Site EPA ID No.	EPA ID Number: OHD 982 601 296		
3. Site Name	Name: CNW, Inc.		
4. Site Location Information	Street Address: 4710 Madison Road		
	City, Town, or Village: Cincinnati	State: OH	
	County Name: Hamilton	Zip Code: 45227	
5. Site Land Type	Site Land Type: <input checked="" type="checkbox"/> Private <input type="checkbox"/> County <input type="checkbox"/> District <input type="checkbox"/> Federal <input type="checkbox"/> Indian <input type="checkbox"/> Municipal <input type="checkbox"/> State <input type="checkbox"/> Other		
6. North American Industry Class. System (NAICS) Code(s) for the Site	A. 323122		B.
	C.		D.
7. Site Contact Person:	First Name: Scott		MI:
	Phone Number: 513-321-2775		Last Name: Newton
	Phone Number Extension:		
	E-Mail Address: snewton@cnwinc.com		
	Fax Number: 513-321-2013		Fax Number Extension:
	Street or P.O. Box: 4710 Madison Road		
	City, Town or Village: Cincinnati		
8. Legal Owner and Operator of the Site List Additional Owners and/or Operators in the Comment Section or on another copy of this form page.	A. Name of Site's Legal Owner: CNW, Inc.		Date Became Owner (mm/dd/yyyy): NOVEMBER, 1983
	Owner Type: <input checked="" type="checkbox"/> Private <input type="checkbox"/> County <input type="checkbox"/> District <input type="checkbox"/> Federal <input type="checkbox"/> Indian <input type="checkbox"/> Municipal <input type="checkbox"/> State <input type="checkbox"/> Other		
	Street or P.O. Box: 4710 Madison Road		
	City, Town, or Village: Cincinnati		
	State: OH		Country: USA
	Zip Code: 45227		
	B. Name of Site's Operator: CNW, Inc.		Date Became Operator (mm/dd/yyyy): NOVEMBER, 1983
	Operator Type: <input checked="" type="checkbox"/> Private <input type="checkbox"/> County <input type="checkbox"/> District <input type="checkbox"/> Federal <input type="checkbox"/> Indian <input type="checkbox"/> Municipal <input type="checkbox"/> State <input type="checkbox"/> Other		
	Street or P.O. Box: 4710 Madison Road		
	City, Town, or Village: Cincinnati		
	State: OH		Country: USA
	Zip Code: 45227		

Change to
Nov 1st

9. Type of Regulated Waste Activity (Mark "X" in the appropriate boxes.)

A. Hazardous Waste Activities

1. Generator of Hazardous Waste
(choose only one of the following three categories)

- ☒ a. Large Quantity Generator (LQG):
Greater than 1,000 kg/mo (2,200 lbs.)
of non-acute hazardous waste; or
- ☐ b. Small Quantity Generator (SQG):
100 to 1,000 kg/mo (220-2,200 lbs.)
of non-acute hazardous waste; or
- ☐ c. Conditionally Exempt Small Quantity Generator
(CESQG):
Less than 100 kg/mo of non-acute hazardous waste

In addition, indicate other generator activities
(check all that apply)

- ☐ d. United States Importer of Hazardous Waste
- ☐ e. Mixed Waste (hazardous and radioactive) Generator

2. Hazardous Waste Report Generator Status
(choose one if a Reason for Submittal is the Hazardous Waste Report)

- ☒ a. Large Quantity Generator (LQG):
Greater than 1,000 kg/mo (2,200 lbs.) of non-acute
hazardous waste was generated at the site in any one
month, or
- ☐ b. Small Quantity Generator (SQG)
In one or more months the site generated greater than
100kg (220 lbs) but in no month did it generate more
than 1,000 kg/mo (220-2,200 lbs) of non-acute
hazardous waste, or
- ☐ c. Conditionally Exempt Small Quantity Generator
(CESQG):
The site generated no more than 100 kg (220 lbs) of
non-acute hazardous waste in any one month.
- ☐ d. Non-Generator
The site did not generate any hazardous waste during
the calendar year.

B. Universal Waste Activities

1. Large Quantity Handler of Universal Waste.
Indicate types of universal waste generated and/or
accumulated at your site. (check all boxes that apply):

	Generated	Accumulated
a. Batteries	<input type="checkbox"/>	<input type="checkbox"/>
b. Pesticides	<input type="checkbox"/>	<input type="checkbox"/>
c. Thermostats	<input type="checkbox"/>	<input type="checkbox"/>
d. Lamps	<input type="checkbox"/>	<input type="checkbox"/>
e. Other (specify) _____	<input type="checkbox"/>	<input type="checkbox"/>
f. Other (specify) _____	<input type="checkbox"/>	<input type="checkbox"/>
g. Other (specify) _____	<input type="checkbox"/>	<input type="checkbox"/>

- ☐ 2. Destination Facility for Universal Waste
Note: A hazardous waste permit may be required for this activity.

For Items 3 through 7, check all that apply:

- ☐ 3. Transporter of Hazardous Waste
- ☐ 4. Treater, Storer or Disposer of Hazardous Waste (at your site) Note: A hazardous waste permit is required for this activity.
- ☐ 5. Recycler of Hazardous Waste (at your site) Note: A hazardous waste permit may be required for this activity.
6. Exempt Boiler and/or Industrial Furnace
- ☐ a. Small Quantity On-site Burner Exemption
- ☐ b. Smelting, Melting, Refining Furnace Exemption
- ☐ 7. Underground Injection Control

C. Used Oil Activities

1. Used Oil Transporter
Indicate Type(s) of Activity(ies)
- ☐ a. Transporter
- ☐ b. Transfer Facility

2. Used Oil Processor and/or Re-refiner
Indicate Type(s) of Activity(ies)
- ☐ a. Processor
- ☐ b. Re-refiner

- ☐ 3. Off-Specification Used Oil Burner

4. Used Oil Fuel Marketer -
Indicate Type(s) of Activity(ies)
- ☐ a. Marketer Who Directs Shipment of Off-Specification
Used Oil to Off-Specification Used Oil Burner
- ☐ b. Marketer Who First Claims the Used Oil Meets the
Specifications

10. **Waste Codes for Federally Regulated Hazardous Wastes.** Please list the codes for the federally regulated hazardous waste handled at your site. List them in the order they are presented in the regulations (e.g., D001, D003, F007, U112). Use an additional page if more space is needed.

11. Comments

12. **Certification.** I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Signature of owner, operator, or an authorized representative	Name and Official Title (type or print)	Date Signed (mm-dd-yyyy)
Tim Napier	Tim Napier, President	11/21/2003



State of Ohio Environmental Protection Agency

2001 Annual Hazardous Waste Report



PLACE PREPRINTED LABEL HERE OR ENTER
GENERATOR ID NUMBER

040982601296

Form GM - Generation and Management

SEC 1	A. Hazardous waste description (60 characters max.) Sludge generated from treating electroplating wastewater				
B. Hazardous waste codes					
F006					
More... <input type="checkbox"/>					
C. Source code Report the Management Method code if the Source code is G25.		Management Method code		D. Waste form code	
G03		H		WS06	
E. RCRA-radioactive mixed Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>					

SEC 2	A. Quantity generated in 2000		B. Quantity generated in 2001		C. UOM Density		D. Was this waste treated, disposed of, or recycled On-site?		
		22607		27460		P		<input type="checkbox"/> Yes (continue to system 1) <input checked="" type="checkbox"/> No (skip to SEC. 3)	
On-site system 1		RCRA-exempt unit? Yes <input type="checkbox"/> No <input type="checkbox"/>		On-site system 2		RCRA-exempt unit? Yes <input type="checkbox"/> No <input type="checkbox"/>			
On-site mgmt method		Quantity treated, disposed or recycled in 2001		On-site mgmt method		Quantity treated, disposed or recycled in 2001			
H				H					

SEC 3	A. Was any of this waste shipped off-site in 2001? <input checked="" type="checkbox"/> Yes (continue to box B) <input type="checkbox"/> No (skip to SEC. 4)		
Site 1	B. EPA ID of facility to which waste was shipped 040980568992	C. Management Method H111	D. Total quantity shipped in 2001 27460
Site 2		H	
Site 3		H	
Site 4		H	
Site 5		H	

SEC.
4

On-site Waste Storage and Inactive Disposal Units

If the site has a storage permit or is undergoing a formal closure of storage or disposal units, and waste remained in the unit(s) as of December 31, complete Box A

Otherwise, skip Section 4.

A. As of December 31, did any of this waste remain on-site in:

Yes ☒ No ☐

1. a greater than 90 day storage unit . . .

☐ a. generated during 2001

☐ b. generated prior to 2001

2. an inactive disposal unit undergoing closure ☐ ☐

[illegible]

Comments:

Extra Waste Codes:



State of Ohio Environmental Protection Agency

2001 Annual Hazardous Waste Report



PLACE PREPRINTED LABEL HERE OR ENTER
GENERATOR ID NUMBER

040982601296

Form GM - Generation and Management

SEC. 1	A. Hazardous waste description (60 characters max.) Waste ink and solvent from proofing operations.				
B. Hazardous waste codes					
D001 F003					
More <input type="checkbox"/>					
C. Source code		Report the Management Method code if the Source code is G25.		Management Method code	
G06		H		H	
D. Waste form code			E. RCRA-radioactive mixed		
WZ09			Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>		

SEC. 2	A. Quantity generated in 2000		B. Quantity generated in 2001		C. UOM Density		D. Was this waste treated, disposed of, or recycled On-site?		
		110		165		G 7.4		<input type="checkbox"/> Yes (continue to system 1) <input checked="" type="checkbox"/> No (skip to SEC. 3)	
On-site system 1		RCRA-exempt unit? Yes <input type="checkbox"/> No <input type="checkbox"/>		On-site system 2		RCRA-exempt unit? Yes <input type="checkbox"/> No <input type="checkbox"/>			
On-site mgmt method		Quantity treated, disposed or recycled in 2001		On-site mgmt method		Quantity treated, disposed or recycled in 2001			
H				H					

SEC. 3	A. Was any of this waste shipped off-site in 2001? <input checked="" type="checkbox"/> Yes (continue to box B) <input type="checkbox"/> No (skip to SEC. 4)		
Site 1	B. EPA ID of facility to which waste was shipped	C. Management Method	D. Total quantity shipped in 2001
	IND000780403	H061	1221
Site 2		H	
Site 3		H	
Site 4		H	
Site 5		H	



0	1	0	9	8	2	6	0	1	2	9	6
---	---	---	---	---	---	---	---	---	---	---	---

5	A. EPA ID of transporter or receiving facility <div style="border: 1px solid black; height: 20px; width: 100%; margin-top: 5px;"></div>	B. Name of transporter or receiving facility (40 characters max.) <div style="border: 1px solid black; height: 20px; width: 100%; margin-top: 5px;"></div>
C. Handler type (check all that apply) <div style="margin-top: 10px;"> <input type="checkbox"/> Transporter <input type="checkbox"/> Receiving Facility </div>		D. Address of receiving facility (address not required for transporters) <div style="margin-top: 10px;"> Street _____ City _____ State <div style="border: 1px solid black; width: 20px; height: 20px; display: inline-block; vertical-align: middle;"></div> ZIP Code <div style="border: 1px solid black; width: 20px; height: 20px; display: inline-block; vertical-align: middle;"></div> - <div style="border: 1px solid black; width: 20px; height: 20px; display: inline-block; vertical-align: middle;"></div> </div>

2000



State of Ohio Environmental Protection Agency

2000 Annual Hazardous Waste Report



PLACE PREPRINTED LABEL HERE

Form IC - Identification and Certification

SEC. 1	SITE NAME AND LOCATION ADDRESS		
A. EPA ID No.		B. County Name	
OH09826011296		Hamilton	
C. Site/company name			
CNW, Inc.			
D. Street name and number. If not applicable, enter other physical location description.			
4710 Madison Road			
E. City		F. State	G. Zip Code
Cincinnati		OH	45227-

SEC. 2	CONTACT INFORMATION			Person who should be contacted if questions arise regarding this report.		
A. Last Name		First Name				
NEWTON		SCOTT				
B. Title		C. Telephone		Extension		
		513-321-2775				
D. E-mail		E. Fax		Extension		
snewton@cnwine.com		513-321-2013				
CONTACT MAILING ADDRESS (If different than the location)						
F. Street name and number						
G. City		H. State		I. Zip Code		

SEC. 3	GENERATOR STATUS	
A. 2000 RCRA generator status (CHECK ONE BOX BELOW)		B. Reasons for not generating (CHECK ALL THAT APPLY)
<input checked="" type="checkbox"/> LQG (skip to SEC. 4) <input type="checkbox"/> SQG <input type="checkbox"/> CESQG <input type="checkbox"/> Non-generator (continue to box B)		<input type="checkbox"/> Never generated <input type="checkbox"/> Out of business <input type="checkbox"/> Only excluded or delisted waste <input type="checkbox"/> Only non-hazardous waste <input type="checkbox"/> Periodic or occasional generator <input type="checkbox"/> Waste minimization activity <input type="checkbox"/> Other (SPECIFY IN COMMENTS BOX)

SEC. 4	ON-SITE WASTE MANAGEMENT ACTIVITIES	
A. Storage unit(s) with a RCRA permit or interim status		B. Treatment, disposal, or recycling units with a RCRA permit or interim status



State of Ohio Environmental Protection Agency

2000 Annual Hazardous Waste Report



PLACE PREPRINTED LABEL HERE OR
ENTER GENERATOR ID NUMBER

040982601296

Form **GM** - Generation and Management

SEC. 1	A. Hazardous waste description (60 characters max.) Sludge generated from treating electroplating wastewaters						
B. Hazardous waste codes F006							
C. SIC Code 2796							
D. Chain code / System type 5		E. Source code M077		F. Point of measurement 1		G. Waste form code B502	
H. RCRA-radioactive mixed Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>							

SEC. 2	A. Quantity generated in 1999 8340		B. Quantity generated in 2000 22607		C. UOM Density P		D. Was this waste treated, disposed of, or recycled On-site? <input type="checkbox"/> Yes (continue to system 1) <input checked="" type="checkbox"/> No (skip to SEC. 3)	
On-site system 1		RCRA-exempt unit? Yes <input type="checkbox"/> No <input type="checkbox"/>		On-site system 2		RCRA-exempt unit? Yes <input type="checkbox"/> No <input type="checkbox"/>		
On-site system type M		Quantity treated, disposed or recycled in 2000		On-site system type M		Quantity treated, disposed or recycled in 2000		

SEC. 3	A. Was any of this waste shipped off-site in 2000? <input checked="" type="checkbox"/> Yes (continue to box B) <input type="checkbox"/> No (skip to SEC. 4)			
Site 1	B. EPA ID of facility to which waste was shipped 04098260568992	C. System type M111	D. Off-site availability code 1	E. Total quantity shipped in 2000 22607
Site 2		M		
Site 3		M		
Site 4		M		
Site 5		M		

SEC. 4		On-site Waste Storage and Inactive Disposal Units																		
If the site has a storage permit or is undergoing a formal closure of storage or disposal units, and waste remained in the unit(s) as of December 31, complete Box A. Otherwise, skip Section 4.		A. As of December 31, did any of this waste remain on-site in: <table border="0"> <tr> <td></td> <td>Yes</td> <td>No</td> </tr> <tr> <td>1. a greater than 90 day storage unit...</td> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> </tr> <tr> <td> <input type="checkbox"/> a. generated during 2000</td> <td></td> <td></td> </tr> <tr> <td> <input type="checkbox"/> b. generated prior to 2000</td> <td></td> <td></td> </tr> <tr> <td>2. an inactive disposal unit undergoing closure</td> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> </tr> </table>					Yes	No	1. a greater than 90 day storage unit...	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> a. generated during 2000			<input type="checkbox"/> b. generated prior to 2000			2. an inactive disposal unit undergoing closure	<input type="checkbox"/>	<input type="checkbox"/>
	Yes	No																		
1. a greater than 90 day storage unit...	<input type="checkbox"/>	<input type="checkbox"/>																		
<input type="checkbox"/> a. generated during 2000																				
<input type="checkbox"/> b. generated prior to 2000																				
2. an inactive disposal unit undergoing closure	<input type="checkbox"/>	<input type="checkbox"/>																		
B. Storage or disposal method	Handling Code	Amount	UOM	Density																
1	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/> lbs/gal <input type="text"/> sg																
2	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/> lbs/gal <input type="text"/> sg																
3	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/> lbs/gal <input type="text"/> sg																
4	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/> lbs/gal <input type="text"/> sg																

Comments:

Extra Waste Codes:



State of Ohio Environmental Protection Agency

2000 Annual Hazardous Waste Report



PLACE PREPRINTED LABEL HERE OR
ENTER GENERATOR ID NUMBER

040982601296

Form GM - Generation and Management

SEC. 1	A. Hazardous waste description (60 characters max.) Electroplating wastewaters						
B. Hazardous waste codes							
F006							
More... <input type="checkbox"/>							
C. SIC Code	D. Origin code / System type	E. Source code	F. Point of measurement	G. Waste form code	H. RCRA-radioactive mixed		
2796	I M	A22	I	B103	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>		

SEC. 2	A. Quantity generated in 1999	B. Quantity generated in 2000	C. UOM	Density	D. Was this waste treated, disposed of, or recycled On-site?		
	4043	17918	6	8.3	<input type="checkbox"/> Yes (continue to system 1) <input checked="" type="checkbox"/> No (skip to SEC. 3)		
On-site system 1		RCRA-exempt unit? Yes <input type="checkbox"/> No <input type="checkbox"/>		On-site system 2		RCRA-exempt unit? Yes <input type="checkbox"/> No <input type="checkbox"/>	
On-site system type		Quantity treated, disposed or recycled in 2000		On-site system type		Quantity treated, disposed or recycled in 2000	
M				M			

SEC. 3	A. Was any of this waste shipped off-site in 2000? <input checked="" type="checkbox"/> Yes (continue to box B) <input type="checkbox"/> No (skip to SEC. 4)			
Site 1	B. EPA ID of facility to which waste was shipped	C. System type	D. Off-site availability code	E. Total quantity shipped in 2000
	040980568992	M111	J	149217
Site 2		M		
Site 3		M		
Site 4		M		
Site 5		M		

SEC. 4		On-site Waste Storage and Inactive Disposal Units																		
If the site has a storage permit or is undergoing a formal closure of storage or disposal units, and waste remained in the unit(s) as of December 31, complete Box A. Otherwise, skip Section 4.		A. As of December 31, did any of this waste remain on-site in: <table border="0"> <tr> <td></td> <td>Yes</td> <td>No</td> </tr> <tr> <td>1. a greater than 90 day storage unit . . .</td> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> </tr> <tr> <td> <input type="checkbox"/> a. generated during 2000</td> <td></td> <td></td> </tr> <tr> <td> <input type="checkbox"/> b. generated prior to 2000</td> <td></td> <td></td> </tr> <tr> <td>2. an inactive disposal unit undergoing closure</td> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> </tr> </table>					Yes	No	1. a greater than 90 day storage unit . . .	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> a. generated during 2000			<input type="checkbox"/> b. generated prior to 2000			2. an inactive disposal unit undergoing closure	<input type="checkbox"/>	<input type="checkbox"/>
	Yes	No																		
1. a greater than 90 day storage unit . . .	<input type="checkbox"/>	<input type="checkbox"/>																		
<input type="checkbox"/> a. generated during 2000																				
<input type="checkbox"/> b. generated prior to 2000																				
2. an inactive disposal unit undergoing closure	<input type="checkbox"/>	<input type="checkbox"/>																		
B. Storage or disposal method	Handling Code	Amount	UOM	Density																
1	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/> <small>lbs/gal</small> <input type="text"/> <small>sq</small> <input type="text"/>																
2	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/> <small>lbs/gal</small> <input type="text"/> <small>sq</small> <input type="text"/>																
3	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/> <small>lbs/gal</small> <input type="text"/> <small>sq</small> <input type="text"/>																
4	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/> <small>lbs/gal</small> <input type="text"/> <small>sq</small> <input type="text"/>																

Comments:

Extra Waste Codes:



State of Ohio Environmental Protection Agency

2000 Annual Hazardous Waste Report



PLACE PREPRINTED LABEL HERE OR
ENTER GENERATOR ID NUMBER

040982601296

Form GM - Generation and Management

SEC. 1	A. Hazardous waste description (60 characters max.) Waste ink and solvent from proofing operations						
B. Hazardous waste codes							
0001 F003							
More... <input type="checkbox"/>							
C. SIC Code	D. Origin code / System type	E. Source code	F. Point of measurement	G. Waste form code	H. RCRA-radioactive mixed		
2796	I M	A29	I	B209	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>		

SEC. 2	A. Quantity generated in 1999	B. Quantity generated in 2000	C. UOM Density	D. Was this waste treated, disposed of, or recycled On-site?
			6 8	<input type="checkbox"/> Yes (continue to system 1) <input checked="" type="checkbox"/> No (skip to SEC. 3)
On-site system 1		On-site system 2		
RCRA-exempt unit? Yes <input type="checkbox"/> No <input type="checkbox"/>		RCRA-exempt unit? Yes <input type="checkbox"/> No <input type="checkbox"/>		
On-site system type	Quantity treated, disposed or recycled in 2000	On-site system type	Quantity treated, disposed or recycled in 2000	
M		M		

SEC. 3	A. Was any of this waste shipped off-site in 2000? <input checked="" type="checkbox"/> Yes (continue to box B) <input type="checkbox"/> No (skip to SEC. 4)			
Site 1	B. EPA ID of facility to which waste was shipped	C. System type	D. Off-site availability code	E. Total quantity shipped in 2000
	IND000780403	M061	J	
Site 2		M		
Site 3		M		
Site 4		M		
Site 5		M		

SEC. 4		On-site Waste Storage and Inactive Disposal Units															
If the site has a storage permit or is undergoing a formal closure of storage or disposal units, and waste remained in the unit(s) as of December 31, complete Box A. Otherwise, skip Section 4.		A. As of December 31, did any of this waste remain on-site in: <table border="0"> <tr> <td>1. a greater than 90 day storage unit . . .</td> <td>Yes</td> <td>No</td> </tr> <tr> <td><input type="checkbox"/> a. generated during 2000</td> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> </tr> <tr> <td><input type="checkbox"/> b. generated prior to 2000</td> <td></td> <td></td> </tr> <tr> <td>2. an inactive disposal unit undergoing closure</td> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> </tr> </table>				1. a greater than 90 day storage unit . . .	Yes	No	<input type="checkbox"/> a. generated during 2000	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> b. generated prior to 2000			2. an inactive disposal unit undergoing closure	<input type="checkbox"/>	<input type="checkbox"/>
1. a greater than 90 day storage unit . . .	Yes	No															
<input type="checkbox"/> a. generated during 2000	<input type="checkbox"/>	<input type="checkbox"/>															
<input type="checkbox"/> b. generated prior to 2000																	
2. an inactive disposal unit undergoing closure	<input type="checkbox"/>	<input type="checkbox"/>															
B. Storage or disposal method	Handling Code	Amount	UOM	Density													
1	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/> lb/gal <input type="text"/> sq <input type="text"/>													
2	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/> lb/gal <input type="text"/> sq <input type="text"/>													
3	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/> lb/gal <input type="text"/> sq <input type="text"/>													
4	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/> lb/gal <input type="text"/> sq <input type="text"/>													

Comments:

Painting.

Extra Waste Codes:



State of Ohio Environmental Protection Agency

2000 Annual Hazardous Waste Report



PLACE PREPRINTED LABEL HERE OR
ENTER GENERATOR ID NUMBER

0H0982601296

Form **GM** - Generation and Management

SEC. 1	A. Hazardous waste description (60 characters max.) Copper cyanide solution						
B. Hazardous waste codes D003							
C. SIC Code 2796		D. Origin code / System type I M		E. Source code AZZ		F. Point of measurement I	
				G. Waste form code B107		H. RCRA-radioactive mixed Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	

SEC. 2	A. Quantity generated in 1999 0		B. Quantity generated in 2000 110		C. UOM Density G 8 4 lb/gal <input type="checkbox"/> gal <input type="checkbox"/>		D. Was this waste treated, disposed of, or recycled On-site? <input type="checkbox"/> Yes (continue to system 1) <input checked="" type="checkbox"/> No (skip to SEC. 3)	
On-site system 1 RCRA-exempt unit? Yes <input type="checkbox"/> No <input type="checkbox"/> On-site system type M Quantity treated, disposed or recycled in 2000				On-site system 2 RCRA-exempt unit? Yes <input type="checkbox"/> No <input type="checkbox"/> On-site system type M Quantity treated, disposed or recycled in 2000				

SEC. 3	A. Was any of this waste shipped off-site in 2000? <input checked="" type="checkbox"/> Yes (continue to box B) <input type="checkbox"/> No (skip to SEC. 4)			
Site 1	B. EPA ID of facility to which waste was shipped 0H0980568992	C. System type M111	D. Off-site availability code I	E. Total quantity shipped in 2000 924
Site 2		M		
Site 3		M		
Site 4		M		
Site 5		M		

SEC. 4		On-site Waste Storage and Inactive Disposal Units			
If the site has a storage permit or is undergoing a formal closure of storage or disposal units, and waste remained in the unit(s) as of December 31, complete Box A. Otherwise, skip Section 4.		A. As of December 31, did any of this waste remain on-site in:			
		1. a greater than 90 day storage unit . . .		Yes <input type="checkbox"/>	No <input type="checkbox"/>
		<input type="checkbox"/> a. generated during 2000			
		<input type="checkbox"/> b. generated prior to 2000			
		2. an inactive disposal unit undergoing closure		<input type="checkbox"/>	<input type="checkbox"/>
B. Storage or disposal method	Handling Code	Amount	UOM	Density	
1	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/> lbs/gal <input type="text"/> sq <input type="text"/>	
2	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/> lbs/gal <input type="text"/> sq <input type="text"/>	
3	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/> lbs/gal <input type="text"/> sq <input type="text"/>	
4	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/> lbs/gal <input type="text"/> sq <input type="text"/>	

Comments:

Extra Waste Codes:



State of Ohio Environmental Protection Agency

2000 Annual Hazardous Waste Report



PLACE PREPRINTED LABEL HERE OR
ENTER GENERATOR ID NUMBER

040982601296

Form **OI** - Off-site Transporter and Receiving Facility Information

1	A. EPA ID of transporter or receiving facility 040980568992	B. Name of transporter or receiving facility (40 characters max.) Enviroite of Ohio Inc.	
	C. Handler type (check all that apply) <input checked="" type="checkbox"/> Transporter <input checked="" type="checkbox"/> Receiving Facility	D. Address of receiving facility (address not required for transporters) Street 2050 Central Avenue SE City Canton State OH ZIP Code 44707	

2	A. EPA ID of transporter or receiving facility IND000780403	B. Name of transporter or receiving facility (40 characters max.) Redclamed Energy Co., Inc.	
	C. Handler type (check all that apply) <input type="checkbox"/> Transporter <input checked="" type="checkbox"/> Receiving Facility	D. Address of receiving facility (address not required for transporters) Street 1500 Western Avenue City Connersville State IN ZIP Code 47331	

3	A. EPA ID of transporter or receiving facility ENR000104224	B. Name of transporter or receiving facility (40 characters max.) Superior Transportation Logistics, Inc.	
	C. Handler type (check all that apply) <input checked="" type="checkbox"/> Transporter <input type="checkbox"/> Receiving Facility	D. Address of receiving facility (address not required for transporters) Street _____ City _____ State _____ ZIP Code _____	

4	A. EPA ID of transporter or receiving facility _____	B. Name of transporter or receiving facility (40 characters max.) _____	
	C. Handler type (check all that apply) <input type="checkbox"/> Transporter <input type="checkbox"/> Receiving Facility	D. Address of receiving facility (address not required for transporters) Street _____ City _____ State _____ ZIP Code _____	

5	A. EPA ID of transporter or receiving facility _____	B. Name of transporter or receiving facility (40 characters max.) _____	
	C. Handler type (check all that apply) <input type="checkbox"/> Transporter <input type="checkbox"/> Receiving Facility	D. Address of receiving facility (address not required for transporters) Street _____ City _____ State _____ ZIP Code _____	



State of Ohio Environmental Protection Agency

1999 Annual Hazardous Waste Report

Form IC - Identification and Certification



PLACE PREPRINTED LABEL HERE

SEC. 1	SITE NAME AND LOCATION ADDRESS		
A. EPA ID No.		B. County Name	
040982601296		Hamilton	
C. Site/company name			
CNW, Inc.			
D. Street name and number. If not applicable, enter other physical location description.			
4710 Madison Road			
E. City		F. State	G. Zip Code
Cincinnati		OH	45227-

SEC. 2	CONTACT INFORMATION			Person who should be contacted if questions arise regarding this report.		
A. Last Name		First Name				
NEWTON		SCOTT				
B. Title		C. Telephone		Extension		
		513-321-2775				
D. E-mail		E. Fax		Extension		
snewton@cnwinc.com		513-231-2013				
CONTACT MAILING ADDRESS (If different than the location)						
F. Street name and number						
G. City		H. State		I. Zip Code		

SEC. 3	GENERATOR STATUS		
A. 1999 RCRA generator status (CHECK ONE BOX BELOW)		B. Reasons for not generating (CHECK ALL THAT APPLY)	
<input checked="" type="checkbox"/> LQG (skip to SEC. 4)		<input type="checkbox"/> Never generated	
<input type="checkbox"/> SQG		<input type="checkbox"/> Out of business	
<input type="checkbox"/> CESQG		<input type="checkbox"/> Only excluded or delisted waste	
<input type="checkbox"/> Non-generator (continue to box B)		<input type="checkbox"/> Only non-hazardous waste	
		<input type="checkbox"/> Periodic or occasional generator	
		<input type="checkbox"/> Waste minimization activity	
		<input type="checkbox"/> Other (SPECIFY IN COMMENTS BOX)	

SEC. 4	ON-SITE WASTE MANAGEMENT ACTIVITIES		
A. Storage unit(s) with a RCRA permit or interim status		B. Treatment, disposal, or recycling units with a RCRA permit or interim status	

SEC. 5	WASTE MINIMIZATION ACTIVITY DURING 1999		
A. Did this site begin or expand a source reduction activity during 1999? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO		B. Did this site begin or expand a recycling activity during 1999? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	
		C. Did this site systematically investigate opportunities for source reduction or recycling during 1999? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	
D. Please provide a concise narrative describing efforts made to reduce the quantity and toxicity of hazardous waste being generated/managed at this location as required by Ohio Administrative Code Rules 3745-52-41 (generators) or 3745-54-75/ 3745-65-75 (TSD facilities). <p style="text-align: center;">Site investigating improvements to wastewater treatment system.</p>			

SEC. 6	I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering information, the information submitted is, to the best of my knowledge and belief, true, accurate and complete. I am aware that there are significant penalties under Section 3008 of the Resource Conservation and Recovery Act for submitting false information, including the possibility of fine and imprisonment for knowing violations.		
A. Please print: Last Name		First Name	
NAPIER		TIM	
B. Title	C. Signature	D. Date of Signature	
PRESIDENT	Tim Napier	month day year 11-21-2003	

COMMENTS:



State of Ohio Environmental Protection Agency

1999 Annual Hazardous Waste Report



PLACE PREPRINTED LABEL HERE OR
ENTER GENERATOR ID NUMBER

040982601296

Form GM - Generation and Management

SEC. 1	A. Hazardous waste description (60 characters max.) Sludge generated from treating electroplating wastewaters					
B. Hazardous waste codes F006						
C. SIC Code 2796						
D. Origin code / System type ST		E. Source code M077		F. Point of measurement A7S		G. Waste form code I
G. Waste form code B502		H. RCRA-radioactive mixed Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>				

SEC. 2	A. Quantity generated in 1998 15390		B. Quantity generated in 1999 8340		C. UOM Density P		D. Was this waste treated, disposed of, or recycled On-site? <input type="checkbox"/> Yes (continue to system 1) <input checked="" type="checkbox"/> No (skip to SEC. 3)	
On-site system 1 M		RCRA-exempt unit? Yes <input type="checkbox"/> No <input type="checkbox"/>		On-site system 2 M		RCRA-exempt unit? Yes <input type="checkbox"/> No <input type="checkbox"/>		
On-site system type M		Quantity treated, disposed or recycled in 1999		On-site system type M		Quantity treated, disposed or recycled in 1999		

SEC. 3	A. Was any of this waste shipped off-site in 1999? <input checked="" type="checkbox"/> Yes (continue to box B) <input type="checkbox"/> No (skip to SEC. 4)			
Site 1	B. EPA ID of facility to which waste was shipped 040980568992	C. System type M111	D. Off-site availability code 1	E. Total quantity shipped in 1999 8340
Site 2		M		
Site 3		M		
Site 4		M		
Site 5		M		

SEC. 4 On-site Waste Storage and Inactive Disposal Units																					
If the site has a storage permit or is undergoing a formal closure of storage or disposal units, and waste remained in the unit(s) as of December 31, complete Box A. Otherwise, skip Section 4.	A. As of December 31, did any of this waste remain on-site in: <table border="0"> <tr> <td></td> <td>Yes</td> <td>No</td> </tr> <tr> <td>1. a greater than 90 day storage unit . . .</td> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> </tr> <tr> <td> <input type="checkbox"/> a. generated during 1999</td> <td></td> <td></td> </tr> <tr> <td> <input type="checkbox"/> b. generated prior to 1999</td> <td></td> <td></td> </tr> <tr> <td>2. an inactive disposal unit undergoing closure</td> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> </tr> </table>		Yes	No	1. a greater than 90 day storage unit . . .	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> a. generated during 1999			<input type="checkbox"/> b. generated prior to 1999			2. an inactive disposal unit undergoing closure	<input type="checkbox"/>	<input type="checkbox"/>					
	Yes	No																			
1. a greater than 90 day storage unit . . .	<input type="checkbox"/>	<input type="checkbox"/>																			
<input type="checkbox"/> a. generated during 1999																					
<input type="checkbox"/> b. generated prior to 1999																					
2. an inactive disposal unit undergoing closure	<input type="checkbox"/>	<input type="checkbox"/>																			
B. Storage or disposal method	<table border="1"> <thead> <tr> <th>Handling Code</th> <th>Amount</th> <th>UOM</th> <th>Density</th> </tr> </thead> <tbody> <tr> <td>1</td> <td><input type="text"/></td> <td><input type="text"/></td> <td> <input type="text"/> lbs/gal <input type="text"/> sg </td> </tr> <tr> <td>2</td> <td><input type="text"/></td> <td><input type="text"/></td> <td> <input type="text"/> lbs/gal <input type="text"/> sg </td> </tr> <tr> <td>3</td> <td><input type="text"/></td> <td><input type="text"/></td> <td> <input type="text"/> lbs/gal <input type="text"/> sg </td> </tr> <tr> <td>4</td> <td><input type="text"/></td> <td><input type="text"/></td> <td> <input type="text"/> lbs/gal <input type="text"/> sg </td> </tr> </tbody> </table>	Handling Code	Amount	UOM	Density	1	<input type="text"/>	<input type="text"/>	<input type="text"/> lbs/gal <input type="text"/> sg	2	<input type="text"/>	<input type="text"/>	<input type="text"/> lbs/gal <input type="text"/> sg	3	<input type="text"/>	<input type="text"/>	<input type="text"/> lbs/gal <input type="text"/> sg	4	<input type="text"/>	<input type="text"/>	<input type="text"/> lbs/gal <input type="text"/> sg
Handling Code	Amount	UOM	Density																		
1	<input type="text"/>	<input type="text"/>	<input type="text"/> lbs/gal <input type="text"/> sg																		
2	<input type="text"/>	<input type="text"/>	<input type="text"/> lbs/gal <input type="text"/> sg																		
3	<input type="text"/>	<input type="text"/>	<input type="text"/> lbs/gal <input type="text"/> sg																		
4	<input type="text"/>	<input type="text"/>	<input type="text"/> lbs/gal <input type="text"/> sg																		

Comments:

Extra Waste Codes:



State of Ohio Environmental Protection Agency

1999 Annual Hazardous Waste Report



PLACE PREPRINTED LABEL HERE OR
ENTER GENERATOR ID NUMBER

0HD982601296

Form **GM** - Generation and Management

SEC. 1	A. Hazardous waste description (60 characters max.) Electroplating wastewaters.					
	B. Hazardous waste codes 10016					
C. SIC Code	D. Origin code / System type	E. Source code	F. Point of measurement	G. Waste form code	H. RCRA-radioactive mixed	
2796	1M	A22	1	B103	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	

SEC. 2	A. Quantity generated in 1998	B. Quantity generated in 1999	C. UOM	Density	D. Was this waste treated, disposed of, or recycled On-site? <input type="checkbox"/> Yes (continue to system 1) <input type="checkbox"/> No (skip to SEC. 3)
		4043	6	8.3	
On-site system 1		RCRA-exempt unit? Yes <input type="checkbox"/> No <input type="checkbox"/>		On-site system 2	
On-site system type		Quantity treated, disposed or recycled in 1999		Quantity treated, disposed or recycled in 1999	
M				M	

SEC. 3	A. Was any of this waste shipped off-site in 1999? <input checked="" type="checkbox"/> Yes (continue to box B) <input type="checkbox"/> No (skip to SEC. 4)			
	B. EPA ID of facility to which waste was shipped			
Site 1	0HD980568992	C. System type	D. Off-site availability code	E. Total quantity shipped in 1999
Site 2		M		4043
Site 3		M		
Site 4		M		
Site 5		M		

SEC. 4		On-site Waste Storage and Inactive Disposal Units																		
If the site has a storage permit or is undergoing a formal closure of storage or disposal units, and waste remained in the unit(s) as of December 31, complete Box A. Otherwise, skip Section 4.		A. As of December 31, did any of this waste remain on-site in: <table border="0"> <tr> <td></td> <td>Yes</td> <td>No</td> </tr> <tr> <td>1. a greater than 90 day storage unit ...</td> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> </tr> <tr> <td> <input type="checkbox"/> a. generated during 1999</td> <td></td> <td></td> </tr> <tr> <td> <input type="checkbox"/> b. generated prior to 1999</td> <td></td> <td></td> </tr> <tr> <td>2. an inactive disposal unit undergoing closure</td> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> </tr> </table>					Yes	No	1. a greater than 90 day storage unit ...	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> a. generated during 1999			<input type="checkbox"/> b. generated prior to 1999			2. an inactive disposal unit undergoing closure	<input type="checkbox"/>	<input type="checkbox"/>
	Yes	No																		
1. a greater than 90 day storage unit ...	<input type="checkbox"/>	<input type="checkbox"/>																		
<input type="checkbox"/> a. generated during 1999																				
<input type="checkbox"/> b. generated prior to 1999																				
2. an inactive disposal unit undergoing closure	<input type="checkbox"/>	<input type="checkbox"/>																		
B. Storage or disposal method	Handling Code	Amount	UOM	Density																
1	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/> lbs/gal <input type="text"/> sq																
2	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/> lbs/gal <input type="text"/> sq																
3	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/> lbs/gal <input type="text"/> sq																
4	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/> lbs/gal <input type="text"/> sq																

Comments:

Extra Waste Codes:

1999 Annual Hazardous Waste Report



PLACE PREPRINTED LABEL HERE OR
ENTER GENERATOR ID NUMBER

Age Group	Percentage
18-24	10%
25-34	15%
35-44	20%
45-54	25%
55-64	30%
65-74	35%
75-84	40%
85+	45%

Form GM - *Generation and Management*

SEC. 1	A. Hazardous waste description (60 characters max.) Waste ink and solvent from proofing operations.										
B. Hazardous waste codes											
D101		F003									
More... <input type="checkbox"/>											
C. SIC Code	D. Origin code / System type			E. Source code		F. Point of measurement		G. Waste form code		H. RCRA-radioactive mixed	
2796	1 M			A29		1		B209		Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	

SEC. 2	A. Quantity generated in 1998 [][][][][][] [2][2] [0]	B. Quantity generated in 1999 [][][][][][] [3][3] [0]	C. UOM Density [6] [7] [] [8] lb/gal <input checked="" type="checkbox"/> sg <input type="checkbox"/>	D. Was this waste treated, disposed of, or recycled On-site? <input type="checkbox"/> Yes (continue to system 1) <input checked="" type="checkbox"/> No (skip to SEC. 3)
On-site system 1	RCRA-exempt unit? Yes <input type="checkbox"/> No <input type="checkbox"/>	On-site system 2	RCRA-exempt unit? Yes <input type="checkbox"/> No <input type="checkbox"/>	
On-site system type [M] [][][]	Quantity treated, disposed or recycled in 1999 [][][][][][][][][]	On-site system type [M] [][][]	Quantity treated, disposed or recycled in 1999 [][][][][][][][][]	

SEC. 3	A. Was any of this waste shipped off-site in 1999?		<input checked="" type="checkbox"/> Yes (continue to box B) <input type="checkbox"/> No (skip to SEC. 4)	
	Site 1	B. EPA ID of facility to which waste was shipped	C. System type	D. Off-site availability code
	Site 2			
	Site 3			
	Site 4			
	Site 5			

SEC. 4		On-site Waste Storage and Inactive Disposal Units			
If the site has a storage permit or is undergoing a formal closure of storage or disposal units, and waste remained in the unit(s) as of December 31, complete Box A. Otherwise, skip Section 4.		A. As of December 31, did any of this waste remain on-site in: 1. a greater than 90 day storage unit... <input type="checkbox"/> a. generated during 1999 <input type="checkbox"/> b. generated prior to 1999 2. an inactive disposal unit undergoing closure <input type="checkbox"/> <input type="checkbox"/>			
B. Storage or disposal method	Handling Code	Amount	UOM	Density	
1	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/> lb/gal sg	
2	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/> lb/gal sg	
3	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/> lb/gal sg	
4	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/> lb/gal sg	

Comments: *Printing*

Extra Waste Codes:



PLACE PREPRINTED LABEL HERE OR
ENTER GENERATOR ID NUMBER

0	4	0	9	8	2	6	0	1	2	9	0
---	---	---	---	---	---	---	---	---	---	---	---

Form OI - *Off-site Transporter and Receiving Facility Information*

5	A. EPA ID of transporter or receiving facility <div style="border: 1px solid black; height: 20px; width: 100%; margin-top: 5px;"></div>	B. Name of transporter or receiving facility (40 characters max.) <div style="border: 1px solid black; height: 20px; width: 100%; margin-top: 5px;"></div>
C. Handler type (check all that apply) <div style="margin-top: 10px;"> <input type="checkbox"/> Transporter <input type="checkbox"/> Receiving Facility </div>		D. Address of receiving facility (address not required for transporters) <div style="margin-top: 10px;"> Street _____ City _____ State <div style="border: 1px solid black; width: 20px; height: 20px; display: inline-block; vertical-align: middle;"></div> ZIP Code <div style="border: 1px solid black; width: 40px; height: 20px; display: inline-block; vertical-align: middle;"></div> - <div style="border: 1px solid black; width: 20px; height: 20px; display: inline-block; vertical-align: middle;"></div> </div>



ATTORNEYS AT LAW

KEATING, MUETHING & KLEKAMP, P.L.L.

1400 PROVIDENT TOWER • ONE EAST FOURTH STREET • CINCINNATI, OHIO 45202-3752

TEL. (513) 579-6400 • FAX (513) 579-6457 • www.kmklaw.com

RECEIVED

BRIAN M. BABB

DIRECT DIAL: (513) 579-6963

FACSIMILE: (513) 579-6457

E-MAIL: BBABB@KMKLAW.COM

DEC - 9 2003

U.S. EPA REGION 5
OFFICE OF REGIONAL ADMINISTRATOR

December 8, 2003

Via Overnight Delivery

Ms. Tinka Hyde, Regional Team Manager
Office of Enforcement and Compliance Assurance
United States Environmental Protection Agency
Region V E-19J
77 West Jackson Boulevard
Chicago, Illinois 60604

Via Overnight Delivery

Mr. Christopher Jones, Director
Ohio Environmental Protection Agency
Lazarus Government Center
122 South Front Street
Columbus, Ohio 43215

RE: CNW, Inc. and CNW Acquisition, LLC - Voluntary Disclosure of Noncompliance

Dear Madam/Sir:

On October 6, 2003, CNW, Inc. and CNW Acquisition, LLC provided a voluntary self-disclosure of noncompliance (copy enclosed) under certain environmental laws to the United States and Ohio Environmental Protection Agencies concerning CNW, Inc.'s Cincinnati manufacturing facility. That self-disclosure was made under U.S. EPA's Audit and Small Business Compliance Policies and under Ohio's Environmental Audit Statute (Ohio Revised Code §3745.72). CNW believes it has taken appropriate measures to timely correct the violations which were self-disclosed. Generally, the corrective measures taken by CNW at its facility are described below:

1. A Notice of Intent application for coverage under the State's General NPDES Permit for Stormwater Discharges Associated with Industrial Activity was submitted on November 4, 2003 to Ohio EPA. A Stormwater Pollution Prevention Plan was developed and completed on November 4, 2003, and has since been implemented. In addition, employee training concerning the implementation of the Stormwater Pollution Prevention Plan was performed on December 3-5, 2003.

2. Air permit to install applications were prepared and were submitted to Ohio EPA on December 5, 2003, for the proof presses, the cylinder cleaning and polishing stations, and solvent cleanup activities.

3. The EPCRA Section 313 Form Rs and associated fees for calendar years 1998-2002 were submitted to the U.S. EPA and Ohio EPA on November 4, 2003.

December 8, 2003

Page 2

4. Hazardous waste management training was provided to all facility employees on December 3-5, 2003. In addition, the company has established procedures for weekly hazardous waste inspections, drum labeling, container management, land ban notifications, and for the maintenance of hazardous waste records during November 2003. Past due annual hazardous waste reports for calendar years 1999-2002 for the facility were submitted to Ohio EPA on November 21, 2003 and the RCRA generator notification information has been updated.

5. CFC service and repair activity records were subsequently determined to be compliant, however, a registration for a refrigerant recovery device was filed on November 14, 2003.

Please let me know if any additional information or documentation concerning these corrective measures is needed.

Very truly yours,

KEATING, MUETHING & KLEKAMP, P.L.L.

BY: Brian M. Babb
Brian M. Babb

Enclosure

cc: Mr. David Stetson
Mr. Timothy R. Napier

MEMORANDUM

SUBJECT: Self-Disclosure Notification

FROM: Jodi Swanson-Wilson
Office of Enforcement and Compliance Assurance

TO: Anthony Restaino
Joseph Boyle
George Czerniak

DATE: October 8, 2003

The Office of Enforcement and Compliance and Assurance is in receipt of a Self Disclosure from *CNW, Inc.* I have included the original letter for your records. Please notify me upon assignment of a Program Contact Person and of the ORC attorney assigned. I will forward all future information that we receive regarding this case directly to the assigned Program Contact.

NOTE: Please indicate on the Attorney Assignment Request Form that this is a self-disclosure case.

RECEIVED
OCT 09 2003

Enforcement & Compliance Assurance Branch
Waste, Pesticides & Toxics Division
U.S. EPA - REGION 5



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF:
C-14J

VIA FACSIMILE AND
FIRST CLASS MAIL

November 20, 2003

Mr. Brian M. Babb, Esq.
Keating, Muething & Klekamp, P.L.L.
1400 Provident Tower
One East Fourth Street
Cincinnati, Ohio 45202

Re: *October 6, 2003 Voluntary Disclosure of Noncompliance by CNW, Inc. and CNW Acquisition, LLC*

Dear Mr. Babb:

The United States Environmental Protection Agency, Region 5 (USEPA or the Agency) has received a copy of your October 6, 2003 letter to Ms. Tinka Hyde, Regional Enforcement Coordinator, in which CNW, Inc., and CNW Acquisition, LLC (collectively "CNW") voluntarily disclosed potential violations of the Clean Air Act, the Clean Water Act, the Resource Conservation and Recovery Act, and the Emergency Planning and Community Right-To-Know Act, at the CNW manufacturing facility located at 4710 Madison Road, Cincinnati, Ohio. According to CNW's preliminary disclosure, these potential violations were discovered during an environmental audit which commenced on September 15, 2003 and was ongoing at the time of the disclosure.

Your letter indicated that CNW made the disclosure under USEPA's Self Disclosure Policy (Incentives for Self Policing: Discovery, Disclosure, Correction and Prevention of Violations), and USEPA's Final Policy on Compliance Incentives for Small Businesses. Please note that the Small Business Compliance Policy, 65 Fed. Reg. 19630 (April 11, 2000) replaced the 1996 Policy on Compliance Incentives for Small Businesses. Enclosed is a copy of the current Small Business Compliance Policy.

I am writing to solicit further information from CNW, Inc., and CNW Acquisition, LLC, in order to evaluate whether USEPA should review the voluntary disclosure under the Self-

Disclosure Policy or the Small Business Compliance Policy, or under different policies for each company. To that end, please respond to the following questions in writing within the next ten business days.

1. State the number of individuals employed by CNW, Inc. at the 4710 Madison Road Facility and at any other facility or operation owned by CNW, Inc. The number of employees should include full time equivalents on an annual basis, including contract employees. Calculate the number of full time employees by totaling the hours worked during the calendar year by all employees, including contract employees, and dividing that total by 2,000 hours.
2. State the total number of individuals employed by CNW Acquisition, LLC, calculated in the same manner as in the response to question 1.
3. Describe CNW, Inc.'s corporate structure, including all parent and subsidiary corporations.
4. Describe CNW Acquisition, LLC's corporate structure, including all parent and subsidiary corporations.
5. State whether or not the acquisition of CNW, Inc.'s assets by CNW Acquisition, LLC is an arm's length transaction, i.e. whether or not CNW, Inc. and CNW Acquisition, LLC, were unrelated parties, each acting in their own self-interest, prior to beginning the process of acquisition and whether or not the purchase of CNW, Inc.'s assets by CNW Acquisition, LLC is being made for a fair market value, and provide the factual basis for such conclusion. If not, please identify the legal relationship between CNW, Inc. and CNW Acquisition, LLC prior to the acquisition.


CNW may, if it desires and if applicable, assert a business confidentiality claim covering part or all of the information requested, in the manner described by 40 C.F.R. §2.203(b). Information subject to a business confidentiality claim is available to the public only to the extent allowed under 40 C.F.R. part 2, subpart B. Failure to assert a business confidentiality claim makes all submitted information available the public without further notice. USEPA is authorized to use the information requested herein in an administrative, civil or criminal action. This request for information is not subject to the approval requirements of the Paperwork Reduction Act, 44 U.S.C. §3501, et seq.

When I have received information from you sufficient to decide under which policy your self disclosure will be evaluated, the Agency will likely request further information about the

disclosure and alleged violations. Your quick response to these requests will allow USEPA to resolve your self-disclosure efficiently.

If you have any questions about this request, please contact me at (312)886-6829.

Sincerely,

A handwritten signature in cursive script, appearing to read "Erik Olson".

Erik Olson
Law Clerk
Office of Regional Counsel

Enclosure

cc: Erik Hardin, AE-17J
Brian Gangwisch, DE-9J
Maynard Shaw, DT-8J



KEATING, MUETHING & KLEKAMP, P.L.L.

ATTORNEYS AT LAW

1400 PROVIDENT TOWER • ONE EAST FOURTH STREET • CINCINNATI, OHIO 45202-3752

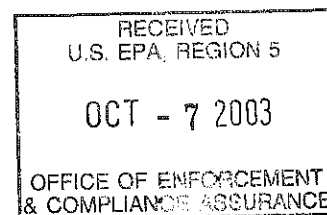
TEL. (513) 579-6400 • FAX (513) 579-6457 • www.kmklaw.com

BRIAN M. BABB

DIRECT DIAL: (513) 579-6963

FACSIMILE: (513) 579-6457

E-MAIL: BBABB@KMKLAW.COM



October 6, 2003

Via Facsimile and Overnight Delivery

Ms. Tinka Hyde, Regional Team Manager
Office of Enforcement and Compliance Assurance
United States Environmental Protection Agency
Region V E-19J
77 West Jackson Boulevard
Chicago, Illinois 60604

Via Facsimile and Overnight Delivery

Mr. Christopher Jones, Director
Ohio Environmental Protection Agency
Lazarus Government Center
122 South Front Street
Columbus, Ohio 43215

RE: CNW, Inc. and CNW Acquisition, LLC Voluntary Disclosure of Noncompliance

Dear Sir/Madam:

On behalf of CNW, Inc. and CNW Acquisition, LLC (collectively "CNW"), this letter serves to promptly and voluntarily self-disclose CNW, Inc.'s noncompliance under certain environmental laws. This disclosure is made consistent with the requirements under the United States Environmental Protection Agency's Self Disclosure Policy (Incentives for Self Policing: Discovery, Disclosure, Correction and Prevention of Violations), and EPA's Final Policy on Compliance Incentives for Small Businesses, Ohio Revised Code ("ORC") Section 3745.72, and the Ohio Environmental Protection Agency's Amended Audit Disclosure Response Protocol. The limited environmental compliance audit that gave rise to this self disclosure of noncompliance was performed on behalf of CNW, Inc. and CNW Acquisition, LLC. CNW Acquisition, LLC is in the process of acquiring the assets of CNW, Inc.

This audit revealed CNW's noncompliance with certain requirements under the Federal Water Pollution Control Act ("FWPCA"), Resource Conservation Recovery Act ("RCRA"), Clean Air Act ("CAA"), Emergency Planning and Community Right-to-Know Act ("EPCRA"), ORC Chapters 3704, 3734, 3750, 6111, and the rules adopted thereunder, concerning the manufacturing facility owned and operated by CNW, that is located at 4710 Madison Road, Cincinnati, Ohio 45227 ("Facility"). CNW, Inc. manufactures rotogravure printing cylinders and flexographic printing plates at this Facility and employs approximately 100 persons. This letter serves to document compliance with the disclosure requirements under U.S. EPA's Self Disclosure Policy and ORC §§ 3745.70 et seq., and to avoid the penalties as provided thereunder for noncompliance.

This self-disclosure of noncompliance is being made as the result of the performance of a recent environmental audit of CNW's Facility by a reputable environmental consultant, which

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was commenced on September 15, 2003 and is in the process of being completed. CNW's noncompliance consists of :

1. failure to obtain a NPDES permit or obtain approval of a Notice of Intent application ("NOI") for coverage under the State's General NPDES Permit for Stormwater Discharges Associated with Industrial Activity, and to develop and implement a Stormwater Pollution Prevention Plan prior to and during 2003, as required under the FWPCA, ORC Chapter 6111, and the regulations adopted thereunder (40 CFR 122, OAC 3745-38);
2. potential failure to obtain air permits to install and operate and to comply with associated regulatory requirements for operations involving but not limited to welding, cylinder polishing, and proof press solvent usage, as required under the CAA, ORC Chapter 3704, and the rules adopted thereunder (OAC 3745-31, 3745-35);
3. failure to ensure compliance with CFC recordkeeping requirements, as required under the CAA, and the rules adopted thereunder (40 CFR 82);
4. failure to ensure compliance with generator hazardous waste management requirements and to provide hazardous waste management training, as required under the RCRA, ORC Chapter 3734, and the rules adopted thereunder (OAC 3745-52); and
5. failure to submit EPCRA Section 313 Forms (Form R) for the period of time prior to and including Calendar Year 2002, as required under the EPCRA, ORC Chapter 3750, and the rules adopted thereunder (40 CFR 372, OAC 3745-100).

This disclosure of noncompliance to U.S. EPA is being made promptly upon completion of this self audit, and CNW is making a reasonable, good faith effort to achieve compliance as quickly as practicable with the above-identified requirements and is committed to preventing the recurrence of these problems. In this regard, within sixty (60) days, CNW will:

1. submit a NOI application for coverage under the State's General NPDES Permit for Stormwater Discharges Associated with Industrial Activity to Ohio EPA and develop and implement a Stormwater Pollution Prevention Plan for the Facility and comply with associated regulatory requirements;
2. further evaluate potential emissions from operations involving welding, cylinder polishing, and proof press solvent usage to determine if air permits to install and operate are required, and if required to timely prepare and submit such applications for the Facility to Ohio EPA;

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3. establish procedures to ensure necessary and required records are maintained concerning CFC maintenance activities at the Facility;
4. provide necessary hazardous waste management training, maintain hazardous waste training records, and ensure compliance with generator hazardous waste management requirements; and
5. submit the EPCRA Section 313 Form Rs for 1998 to 2002 for the Facility to U.S. EPA and Ohio EPA.

This self-disclosure was not required by law, prior litigation or an order of a court or governmental agency. CNW has not committed a pattern of violations and it does not know or have reason to know that U.S. EPA, Ohio EPA, or another agency has commenced an investigation or enforcement action concerning its failure to comply with the requirements under the RCRA, CAA, FWPCA, EPCRA, or ORC Chapters 3704, 3734, 3750, or 6111, and the rules adopted thereunder. The noncompliance which has occurred, or may have occurred, has not resulted in serious harm or in the imminent and substantial endangerment to human health or the environment, and has not resulted in significant economic benefit to CNW. This disclosure is being made by:

David Stetson, Member
CNW Acquisition, LLC
50 East RiverCenter, Suite 820
Covington, Kentucky 41011
859-491-0500, Ext. 24 - Telephone
859-491-0508 – Facsimile

and

Tim Napier, President
CNW, Inc.
4710 Madison Road
Cincinnati, Ohio 45227
513-321-2775, Ext. 305 - Telephone
513-321-2013 – Facsimile

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Further information concerning this disclosure may be obtained from:

Brian M. Babb, Esq.
Keating, Muething & Klekamp, P.L.L.
1400 Provident Bank
One East Fourth Street
Cincinnati, Ohio 45202
513/579-6963 - Telephone
513/579-6457 - Facsimile

Please contact me should you have additional questions or need more information concerning this disclosure.

Very truly yours,

KEATING, MUETHING & KLEKAMP, P.L.L.

BY: _____



Brian M. Babb

cc: Mr. David Stetson
Mr. Tim Napier

